Members of the Planning Committee of the Chilterns Conservation Board for the Chilterns Area of Outstanding Natural Beauty are hereby summoned to a meeting of

Planning Committee

on 10.00 a.m. Wednesday 17th July 2019

at The Chilterns Conservation Board office, 90 Station Road, Chinnor, OX39 4HA

Agenda

1. Election of Chair and Vice Chair 10.00 – 10.05
2. Apologies 10.05 – 10.06
3. Declarations of Interest 10.06 – 10.07
4. Minutes of Previous Meeting 10.07 – 10.12
5. Matters Arising 10.12 – 10.20
6. Public Question Time 10.20 – 10.30
7. Update on Great Western Project 10.30 – 10.50
8. Chilterns Buildings Design Awards 2019 Update 10.50 – 11.05
9. Light pollution discussion 11.05 – 11:30
10. Development Plans responses and updates 11.30 – 12.05
11. Planning Application responses and updates 12.05 – 12.20
12. Any urgent business 12.20 – 12.25
13. Date of Next and Future Meetings 12.25 – 12.30
Item 1  **Election of Chair and Vice Chair**

**Author:** Lucy Murfett  Planning Officer

**Lead Organisations:** Chilterns Conservation Board

**Resources:** Chair’s special allowance.

**Summary:** The Planning Committee is required to elect a chair. The re-appointment for this position will take place annually following the Board’s Annual General Meeting.

**Purpose or report:** To elect a Chair and Vice Chair.

**Background**

1. The Planning Committee should elect a chair at its first meeting following the Annual General Meeting (which took place on 26th June 2019). Until the chairman is elected the Planning Officer will chair the meeting.

2. Nominations can be made either before the meeting, by notifying the Planning Officer, or at the meeting itself. If there is more than one nomination there will be a ballot of the Board members present. The Standing Order on regulating meetings states that votes should be determined by a show of hands.

3. In the event of a tie names will be drawn from a hat by the Planning Officer.

4. The Standing Orders do not require the appointment of a Vice Chair, but it is helpful for a deputy to be appointed in the event that for any particular meeting, the Chair is unable to attend.

**Recommendation**

1. That the Planning Committee nominates and elects a Chair and Vice chair to serve until the Board’s next Annual General Meeting.
Item 3   Minutes of Previous Meeting

Author: Lucy Murfett Planning Officer

Lead Organisations: Chilterns Conservation Board

Resources: Budget of £500 per year for minute-taker plus staff time

Summary: Minutes of the previous meeting are attached (at Appendix 1) and require approval.

Purpose of report: To approve the Minutes of the previous meeting.

Background

1. The draft minutes from the meeting on Wednesday 6th March 2019 are attached (at Appendix 1) for approval.

Recommendation

1. That the Committee approves the minutes of its meeting which took place on 6th March 2019.
MINUTES OF THE MEETING OF THE PLANNING COMMITTEE OF THE CHILTERNs CONSERVATION BOARD FOR THE CHILTERNs AREA OF OUTSTANDING NATURAL BEAUTY
held on Wednesday 6th March 2019 at The Chilterns Conservation Board office, 90 Station Road, Chinnor OX39 4HA commencing at 10.10 AM

BOARD MEMBERS PRESENT

<table>
<thead>
<tr>
<th>Member</th>
<th>Appointing Body</th>
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<tbody>
<tr>
<td>Appointed by Local Authorities</td>
<td></td>
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<tr>
<td>Cllr Lynn Lloyd</td>
<td>South Oxfordshire District Council</td>
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<tr>
<td>Cllr Nick Rose</td>
<td>Chiltern District Council</td>
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<td>Appointed by the Secretary of State</td>
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<td>Colin Courtney</td>
<td>Secretary of State</td>
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<td>Helen Tuffs</td>
<td>Secretary of State</td>
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<tr>
<td>Elizabeth Wilson</td>
<td>Secretary of State- Chair</td>
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<td>Elected by Parish Councils</td>
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<td>Cllr Sue Biggs</td>
<td>Oxfordshire</td>
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<td>Co-opted Members</td>
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<td>Chris Hannington</td>
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<td>Paul Hayes</td>
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<td>Officers present-</td>
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<tr>
<td>Lucy Murfett</td>
<td>CCB Planning Officer</td>
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<tr>
<td>Mike Stubbs</td>
<td>CCB Planning Advisor</td>
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<tr>
<td>Sue Holden</td>
<td>CCB Chief Officer (for item 8)</td>
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<tr>
<td>And others</td>
<td></td>
</tr>
<tr>
<td>Deirdre Hansen</td>
<td>Minute taker</td>
</tr>
</tbody>
</table>

353. Apologies for absence
Apologies were received from Cllr David Barnard, North Herts District Council, Cllr Hugh McCarthy, Wycombe District Council and Cllr Alison Balfour-Lynn, Hertfordshire Parish Councils.

354. Declarations of Interest
No declarations of interest were made

355. Minutes of the previous meeting
The minutes of the meeting held 21st November 2018 were approved as a true record and signed by the Chair once an ‘ was added to governments in item 352.

356. Matters Arising from the minutes
The Planning Officer mentioned that due to the priority of her work on the Management Plan, she had not commenced on the work mentioned in item 352.

The Planning officer was commended on her work on the Management Plan.

357. Public Question time
No public present.

358. Co-option to the Planning Committee
The Board’s standing orders allow the Planning Committee to co-opt up to four Non-Board members to the Committee. Currently the Committee has one co-opted member.

Paul Hayes, a chartered surveyor and register valuer by profession has come forward for co-option.

1. The Committee AGREED to co-opt Paul Hayes to the Planning Committee.

2. The Committee NOTED the other co-opted places that exist on the Planning Committee and would make suggestions.

359. Model Policy Update
The Planning Officer presented an update to the AONB model policy refreshing the references post the new version of the NPPF.

The Committee discussed the paper, AONB setting was brought up, but it was decided to discuss this at a future meeting.

1. The Committee APPROVED the revised AONB Model Policy (v2).

360. Offsetting and Environmental Net Gain
The Planning Officer gave an introduction on the principle that development in or affecting the AONB will contribute in practical and financial ways to delivering the aims of the new Chilterns AONB Management Plan by strategic Objective DO2, Policy DP10 and DP14.

The Chief Officer joined the meeting.
Under S100E LGA 1972 It was resolved to exclude the public from the meeting to discuss matters relating to net gain regarding the Electrification of the Great Western Mainline Reading-Didcot affecting the Chilterns and the North Wessex Downs AONBs

Following discussion, the meeting was re-opened.

The Planning Officer was thanked for her extensive and continued work on this project and the genuine gain achieved by influencing a national body.

The Chief Officer left the meeting.

1. The Committee DISCUSSED offsetting and net gain and PROVIDED a steer for the implementation of AONB Management Policy.

361. Planning Applications Update
The Planning Advisor informed the Committee about and sought approval for, the 17 responses and 5 appeal representations that have been made by the Planning Advisor under delegated powers in connection with Planning Applications as detailed in the agenda.

The responses were briefly discussed, and particular note was made of:

- P18/S3724/DA and P18/S3275/DA, PINS ref APP/Q3115/C/18/3215490 and APP/Q3115/C/18/3215491 Land at Holly House, Harpsden due for inquiry in April.
- APP/Q3115/W/17/3188694 Land off Crowell Road, Chinnor- appeal dismissed.
- 18/05926/FUL Old Rifle Range Farm, Great Kimble- refused.
- 17/03203/FUL Land south of river Thames and west of Gatehampton- refused.
- CH/2017/1648/FUL, App/X0415/C/17/3190005 Caravan site- appeal dismissed
- 18/08068/FUL Land adjacent allotment gardens Queensway, Hazlemere.
- 4/00045/19/MOA Marchmont Farm, Hemel Hempstead
- 4/03266/18/MAO Land West Hemel (site allocation LA3)
- APP/K0425/W/18/3217965 and APP/K0425/W/18/3217966 Land rear of Park Mill Princes Risborough.
- 19/00399/APP Arla Foods ltd. Aston Clinton

1. The Committee NOTED and APPROVED the responses made in connection with the applications as listed.

362. Development Plan Responses
The Planning Officer informed the Committee that she had submitted representations on 11 consultations of which 4 were local plans or neighbourhood plans, 1 a CIL consultation and several government consultations.

1. The Committee APPROVED the responses that had been sent, NOTED the current consultations on development plans and provided comments to the Planning Officer as appropriate.

363. Urgent Business
a. This is Helen Tuffs last Planning Committee meeting as a Board Member. She was thanked for all her work and commended on her clear and honest comments on the purposes of the Chilterns AONB and her steer on the work of the Conservation Board. The Committee was very grateful to Helen. She was presented with a small gift.

Helen thanked the Committee and said it had been a privilege and a pleasure. She had learned so much and the Committee does a tremendous amount of work for the Board and the Chilterns.

Date of the next meeting Wednesday 17th July 2019 at CCB offices at 10.00 am.

Further meeting: Wednesday 20th November 2019.

The Chair……………………………………….. Date…………
**Item 7**  
**Update on Great Western Project**

**Author:** Lucy Murfett Planning Officer  
**Lead Organisations:** Chilterns Conservation Board  
**Resources:** Staff time  
**Summary:** An update on the newly funded Great Western Project in Southern Oxfordshire  
**Purpose of report:** As above

**Background**

1. Arising from item 8 of the last meeting, the Board has been offered and has accepted funding from Network Rail to run a new project to mitigate and compensate for the harm resulting from the now completed rail electrification project on the Great Western Mainline.

2. This will be a joint project run with the North Wessex Downs AONB. A steering group made up of Chilterns Conservation Board, the North Wessex Downs AONB Partnership and the Railway Action Group representing the local community will steer the project.

3. Three meetings have now been held of the partners, with a project initiation meeting on 1st May, a project brainstorming session on 14th May and the first steering group meeting on 3rd July 2019.

4. The Draft Scope, Vision and Objectives for the project has been worked up. The project will run for 5 years. Projects will be within the rail corridor of the 20 kilometre (12 mile) stretch of Great Western Railway that runs through the AONBs between the outskirts of Reading and the outskirts of Didcot. There will be two types of projects based on the agreement with Network Rail:

   **Mitigation planting**
   
   £750,000 must be allocated to mitigation planting involving line-side planting and screening vegetation. All projects must be approved as suitable in habitat terms and compatible with landscape character of the AONBs.

   **AONB enhancement**
   
   £3 million must be allocated to projects that address the residual harm from the Great Western Electrification Project that has not been mitigated, through delivery of projects in the rail corridor that enhance the AONB. Suitable projects are likely to benefit the protected landscape, biodiversity, visual impact, wildlife, historic landscape, heritage, landscape connectivity & resilience, public enjoyment, access. Where possible projects should include community benefit and involvement.
5. All projects should be compatible with the relevant AONB Management Plan policies and objectives. The project should deliver a lasting positive legacy for the rail corridor affected by the Great Western Electrification Project.

6. The CCB will employ two members of staff, a Project Manager and a Project Officer to lead this project. The Project Manager will be line managed by the CCB Planning Officer. A small office base within the project area will be established.

**Recommendation**

- To note the update on the new project and provide suggestions.
Item 8  **Chilterns Buildings Design Awards 2019 Update**

**Author:** Lucy Murfett Planning Officer

**Lead Organisations:** Chilterns Conservation Board

**Resources:** Staff time, Planning Committee member time, CCB budget £500

**Summary:** A report on the 2019 Chilterns Buildings Design Awards.

**Purpose of report:** To update the Committee on this year’s awards.

**Background**

1. The Chilterns Buildings Design Awards 2019 recently concluded, organised jointly by the Chilterns Conservation Board and the Chiltern Society.

2. The awards showcase the very best new buildings in the Chilterns, celebrate excellence and promote good practice in designing buildings which are particularly sympathetic to the character of the Chilterns countryside and villages. The Judging Team contained two architects, two planners and a historic buildings specialist. Two judges were nominated by the Chiltern Society, two from Chilterns Conservation Board, together with an independent chair Dr James Moir (who worked on the original Chilterns Buildings Design Guide and technical notes) and a previous Award winner.

3. This was the 19th year of the Chiltern Building Design Awards, and there were 19 entries. The judging panel shortlisted entries on 27th March, visited 7 shortlisted entries on 15th May and chose two overall joint winners and to give one highly commended award. The culmination of the Awards was the presentation to all three on 19th June at winning house Incurvo in South Oxfordshire.

4. Congratulations to this year’s winners:

**Overall Joint Winner 2019: River Thames Footbridge**

This new footbridge, designed by specialist bridge designers Knight Architects of High Wycombe, is an elegant and delightful new addition to the Thames riverside. Drawing inspiration from Brunel’s nearby Maidenhead Railway Bridge, this 35m single-span bridge has sweeping twin arcs of triangular section steel cradling the deck. Linking the regenerated and previously unconnected Taplow Paper Mill quarter to Ray Mill Island, the bridge unlocks a new tranquil walking route to the Thames Path. This light-touch intervention appears to have been effortlessly dropped into this location, opening up great views of the riverscape and creating a new and fully accessible recreational amenity.
Overall Joint Winner 2019: Incurvo

Incurvo, as its name suggests, is a graceful, sinuous new residence that delights the eye whichever point it is viewed from. The sculptural design by Adrian James Architects of Oxford connects beautifully with its surroundings. The imposing entrance and stair-hall rises through two storeys with rooms flowing off this and thence through two storey-height glazing to the outside. Cleverly sited on an irregular contoured plot at the edge of Goring-on-Thames, the elegantly crafted landscaped gardens respond intimately to the sinuous curves of the house, and blend seamlessly into the Chilterns countryside beyond. The warm red handmade bricks have been masterfully laid to create curved walls and are complemented by vertical charcoal zinc panels. Concealed energy-saving measures mean the house is virtually carbon neutral.

Highly Commended 2019: Dock Farm Restoration

DP Architects of Watlington have carried out an exemplary restoration of this modest Grade II Listed 17th century former farmhouse. Too often, resources are spent on extensions and unnecessary upgrading, with consequent loss of historic fabric and significance. So the judges particularly wanted to commend this scheme for its rigour and restraint, and for the meticulous care with which the works were carried out. The farmhouse has retained all of its simple character, telling its long history through the exposed elm timber-frame, multi-phase brick infill, and many internal features that have been carefully conserved.

5. The awards are now run biennially, and the deadline for the next awards will be 1st March 2021. Committee is asked to encourage owners or designers of any great building or structure in the wider Chilterns area completed in the last three years to apply.

Recommendation

1. That the Committee notes the update.
Item 9  Discussion on Light Pollution

Author: Lucy Murfett Planning Officer

Lead Organisations: Chilterns Conservation Board

Resources: Staff time and Board Member time

Summary: To discuss and consider issues of light pollution and how to progress further guidance or project work on this.

Purpose of report: As above.

Background

1. Board received an inspiring and troubling presentation on dark skies and light pollution from Bob Mizon of the British Astronomical Association at a Board meeting on 7th February 2017.

2. Since then we have developed a new stronger approach to preventing light pollution in the newly adopted Chilterns AONB Management Plan 2019-24:

**Strategic Objective DO2**  Ensure that where development happens, it leaves the AONB better than it was before – richer in wildlife, quieter, darker at night, designed to have a low impact on the environment, and beautiful to look at and enjoy.

**Policy DP2**  Reject development in the AONB unless it meets the following criteria:
- it is a use appropriate to its location,
- it is appropriate to local landscape character,
- it supports local distinctiveness,
- it respects heritage and historic landscapes,
- it enhances natural beauty,
- ecological and environmental impacts are acceptable,
- there are no detrimental impacts on chalk streams,
- there is no harm to tranquillity through the generation of noise, motion and light that spoil quiet enjoyment or disturb wildlife, and
- there are no negative cumulative effects, including when considered with other plans and proposals.

**Policy DP8**  Keep skies dark at night by only using light where and when needed. All new lighting should be the minimum required and meet or exceed guidance for intrinsically dark zones. Avoid architectural designs that spill light out of large areas of glazing.
Supporting text to DP8:
The Chilterns AONB has relatively dark skies for the south east, making it a place people can still experience the wonder of starry skies and good for wildlife. AONBs are intrinsically dark environments (Zone E1 in the Institute of Lighting Professionals guidance) and planning conditions should be applied to restrict and control lighting. Light pollution of all types should be first prevented, by avoiding light where it is not needed, and where it is, by designing lighting to mitigate harm, through shading, height of fixings, beam orientation, LUX, colour temperature and the proposed hours of use. For example, downward pointing, shielded, operated on timer, and with a ‘warm white’ colour temperature of 2700-Kelvin maximum.

Traditional Chilterns vernacular buildings have small windows. Modern designs with large areas of glazing should be avoided so that buildings do not appear as boxes of light in the countryside at night, and glinting glazing in the daytime.

Policy DP15

Seek opportunities to remove or replace existing inappropriate external lighting to restore dark skies at night.

Supporting text to DP15:
Householders, farms, community facilities, recreational facilities and businesses in the AONB can take simple steps to reduce light pollution by:
- Angling existing lights downwards
- Fitting timers
- Replacing existing lighting with designs appropriate for intrinsically dark zones

3. Government policy in the NPPF para 180 is that

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

4. Other protected landscapes (e.g. Cranborne Chase AONB, Northumberland National Park, Exmoor National Park, the South Downs National Park) have taken a strong lead in protecting dark skies and preventing light pollution. Some have been successful in achieving International Dark Sky Reserve or Dark Sky Park status. The Chilterns is unlikely to qualify for these because of existing light pollution levels. However light pollution is a form of pollution that is entirely reversible, and we could seek to reduce light pollution and protect dark skies in the Chilterns.
5. There are many potential approaches Chilterns Conservation Board could take including:
   - producing of design guidance on light fittings
   - producing a supplementary technical note to the Chilterns Buildings Design Guide on lighting
   - screening planning applications for light pollution impacts
   - recommending model conditions on lighting are applied to any planning permissions
   - producing guidance for householders and businesses to raise awareness
   - convening a meeting or event for those who commission street lighting (our County Councils, Town Councils, Parish Councils) to address LED lighting roll out issues
   - running a project to identify major sources of light pollution and working with landowners and householders to reduce impacts
   - working in conjunction with parish councils and volunteers
   - working with a lighting company
   - running a dark skies awards to reward best project to reduce or eliminate light pollution

6. These all have resourcing implications beyond current staff capacity. Committee could help decide the level of priority, the approach to take, and suggest methods of delivery.

Recommendations

1. That the Committee discusses light pollution and provides a steer and assistance with taking forward work on light pollution and dark skies.
Item 10  
Planning Applications Update

Author: Mike Stubbs Planning Advisor

Lead Organisations: Chilterns Conservation Board

Resources: Staff time

Summary: Representations have been made regarding a number of planning applications and a number of previous cases have been determined.

Purpose of report: To inform the Committee about, and seek approval of, the responses that have been made under delegated powers in connection with the planning applications as listed and to update the Committee on any outcomes.

Background

1. News on the outcome of previous planning applications on which the Board has made representations is summarised in Appendix 2.

2. Since the last Planning Committee papers for the March 2019 meeting, the Board has made 19 formal representations on planning applications, of which 8 were objections and 11 were comments. The Board has also made 2 appeal representations, 1 scoping opinion response and 1 set of comments to a local authority on a pre-application proposal. The formal representations are summarised in Appendix 3.

3. Current live casework is listed in Appendix 4.

Recommendations

1. That the Committee notes and approves the responses made in connection with the applications listed in Appendix 3.
## Appendix 2

**Update on Status of Planning Applications CCB previously commented upon**

<table>
<thead>
<tr>
<th>Location</th>
<th>LPA</th>
<th>Ref. No.</th>
<th>Proposal</th>
<th>Status</th>
<th>CCB response</th>
<th>Date CCB responded</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land West of Cockernhoe / Land East of Cockernhoe</td>
<td>NHDC</td>
<td>16/02014/1</td>
<td>Erection of 660 dwellings</td>
<td>Pending</td>
<td>CCB Comments as previously reported</td>
<td>05.03.16</td>
</tr>
<tr>
<td>Land south and north-west of Cockernhoe and east of Wigmore, Cockernhoe</td>
<td>NHDC</td>
<td>17/00830/1</td>
<td>Mixed use application for up to 1,400 new dwellings and other uses - Outline planning application with all matters reserved</td>
<td>Pending</td>
<td>CCB Objection as previously reported</td>
<td>3.8.17</td>
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<tr>
<td>Land to the south of Newnham Manor, Crowmarsh Gifford Planning Application</td>
<td>SODC</td>
<td>P16/S3852/ FUL</td>
<td>Hybrid planning application for the erection of 100 new residential dwellings</td>
<td>Pending</td>
<td>CCB Qualified Objection as previously reported</td>
<td>24.7.18</td>
</tr>
<tr>
<td>Land at Britwell Road Watlington</td>
<td>SODC/PINS</td>
<td>P17/S3231/ O APP/Q3115/W/19/3222822</td>
<td>(1) Full planning permission for the demolition of the existing pig farm and its associated buildings; the erection of 183 dwellings (2) Outline permission for up to 650sqm of Use Class B1a floorspace</td>
<td>Pending</td>
<td>Part CCB Comment on LVIA / Part Objection to raised numbers above SODC Capacity Study CCB Objection / comments as previously reported Appeal submitted against non-determination (appeal date for 15th Oct 2019). CCB written representations Submitted 6th August 2018, as previously reported.</td>
<td>27.09.18</td>
</tr>
<tr>
<td>OS Parcel 8784 &amp; OS Parcel 0006 Mill Lane Monks Risborough</td>
<td>WDC</td>
<td>17/07666/O UT</td>
<td>Outline application (Including details of access) for the erection of up to 300 dwellings</td>
<td>Pending</td>
<td>CCB Comments As previously reported</td>
<td>30.10.17</td>
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<td>Further consultation 4.4.18 (amended details as reported and objection maintained)</td>
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<tr>
<td>Shirburn Road Watlington</td>
<td>SODC</td>
<td>P18/S0002/ O</td>
<td>Outline application for up to 37 Assisted Living Units, and provision of a Care Home (All C2 Use.</td>
<td>Pending</td>
<td>CCB Comments as previously reported.</td>
<td>2.2.18</td>
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<td>CCB recommended various design amendments to improve the AONB setting relationship.</td>
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<tr>
<td>Project Description</td>
<td>Authority</td>
<td>Reference</td>
<td>Description</td>
<td>Status</td>
<td>Comments</td>
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<td>Century Park Luton</td>
<td>LBC</td>
<td>17/02300/EIA</td>
<td>Outline Consent for a business park comprising office space (Class B1), warehouse and industrial space and Full application for the construction of a 2km Century Park Access Road</td>
<td>Pending</td>
<td>CCB Holding Objection / Part comment as previously reported. Objection based on vehicular routing and cumulative impacts on the AONB, without necessary assurances in the application details.</td>
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<tr>
<td>Abbey View Primary Academy</td>
<td>BCC</td>
<td>CC/0017/18</td>
<td>Development of a new two storey 2FTE (420 place) primary school</td>
<td>Pending</td>
<td>CCB Comments as previously reported.</td>
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<tr>
<td>Land at White Cross Farm, Reading Road, Cholsey, Oxfordshire</td>
<td>OCC</td>
<td>0033/18</td>
<td>Planning Application to allow the development of an offline River Thames marina basin with fixed and floating pontoon moorings for approximately 280 boats.</td>
<td>Pending</td>
<td>CCB Objection as previously reported.</td>
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<tr>
<td>22 &amp; 24 Chapel Road &amp; Land To The Rear Of 26 &amp; 16 Chapel Road Flackwell Heath</td>
<td>WDC</td>
<td>18/05414/OUT</td>
<td>Outline application (all matters reserved accept for access) for the redevelopment of site comprising erection of 950m2 of B1 office space and the erection of up to 22 affordable housing units</td>
<td>Pending</td>
<td>CCB Comment as previously reported. Written representation appeal lodged against application 18/00107/NONDET – similar level of development and outline application (all matters reserved accept for access) for the redevelopment of site comprising erection of 950m2 of B1 office space and the erection of up to 22 affordable housing units and associated works including demolition/clearance of existing commercial uses.</td>
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<tr>
<td>Site LA5, Icknield Way Tring</td>
<td>DBC</td>
<td>4/00958/18/MFA</td>
<td>Hybrid planning application for 240 dwellings, cemetery car park with toilet block and public open space</td>
<td>Pending</td>
<td>CCB Objection as previously reported / subsequent amendments supported. Amendments were submitted (August 2018) and supported: (a) Additional details to reduce / prevent lighting ‘glare’. (b) New planting to the western boundary and a redesign of layout here. (c) CCB recommended that the cemetery extension element is further enhanced by promoting design concepts derived from natural burial grounds within the UK for</td>
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21.1.18

2.5.18

1.6.18

27.3.18

22.5.18
| Location | Authority | Ref. | Description | Decision | CCB Comments
|----------|-----------|------|-------------|----------|----------------|
| Land Lower Icknield Way Chinnor. Development of 79a - 83 | SODC | P18/S1004/O | 60 dwellings, with associated open space, landscaping, vehicular access and footpath links. | Refused 18.4.19 | CCB Comment as previously reported
| White House Farm Cryers Hill Lane Cryers Hill Bucks | WDC | 17/08051/FUL | Demolition of existing dwellinghouse and construction of replacement detached dwellinghouse | Refused 13.5.19 | CCB Comments as previously reported
| Abbey Barn Lane- Abbey Barn South Reserve Site Abbey Barn Lane High Wycombe Bucks | WDC | 18/05363/FUL | A hybrid planning application seeking outline consent for up to 550 residential dwellings (with a minimum of 520 dwellings) | Pending | CCB Comments as previously reported
| Land at Beechwood Lane Wendover Bucks | PINS | APP/J0405/W/18/3210518 | Erection of one dwelling | Appeal Dismissed 14th Feb 2019 | CCB Written Representations. Appeal dismissed.

Paragraph 13. ‘I acknowledge that conservation is distinct from preservation. Nevertheless, whilst appropriate change may be acceptable in the AONB I concur with The Chilterns Conservation Board that the proposed change that would come about from the development would harm the landscape character and special qualities of the AONB. The development would consequently conflict with the part of saved Policy GP.35 of the Aylesbury Vale District Local Plan which requires new development to respect and complement the physical characteristics of the site and the surroundings and the
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<th>Location</th>
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<th>Application Details</th>
<th>Decision Date</th>
<th>Comments</th>
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<tr>
<td>Land to the east of Benson Lane Crowmarsh</td>
<td>SODC</td>
<td>P18/S0827/O</td>
<td>Outline planning application for up to 150 dwellings</td>
<td>Granted 22nd May 2019</td>
<td>CCB Comment as previously reported</td>
<td>12.5.18</td>
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<tr>
<td>Land South West Of Asheridge Road Chesham</td>
<td>CDC</td>
<td>CH/2018/0659/OA</td>
<td>Outline application for the development of site to provide up to 99 dwellings</td>
<td>Pending</td>
<td>CCB Objection as previously reported</td>
<td>5.6.18</td>
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<tr>
<td>Chinnor Hill Kennels</td>
<td>SODC</td>
<td>P18/S1674/O</td>
<td>Redevelopment for 5 dwellings</td>
<td>Granted 7th May 2019</td>
<td>CCB Comments as previously reported</td>
<td>21.6.18</td>
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<tr>
<td>Greendene Farm near Chazey Heath RG4 7UG</td>
<td>SODC</td>
<td>P18/S0650/FUL</td>
<td>65-bedroom elderly care home</td>
<td>Pending</td>
<td>CCB Comments as previously reported</td>
<td>3.10.18</td>
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<tr>
<td>Tralee Farm 20 Wycombe Road Holmer Green Bucks</td>
<td>WDC</td>
<td>18/07194/OUT</td>
<td>Outline application (including details of access, layout &amp; scale) for erection of 103 dwellings with all other matters reserved</td>
<td>Pending</td>
<td>CCB Comment / Part Objection as previously made (based on Local Plan due process)</td>
<td>25.9.18</td>
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<tr>
<td>Kitchens Field, Castle Hill, Berkhamsted</td>
<td>DBC</td>
<td>4/01663/18/FUL</td>
<td>Light external drive and parking area</td>
<td>Pending</td>
<td>CCB Objection as previously reported</td>
<td>26.7.18</td>
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<tr>
<td>Upper Little London Farm Little London Wendover Buckinghamshire HP22 6QQ</td>
<td>AVDC</td>
<td>17/00148/AOP</td>
<td>Outline application for the demolition of the existing metal barns and outbuildings, conversion of four historic brick barns into one single dwelling, provision of three open fronted parking barns, replacement of existing farm house and erection of 10 new dwellings</td>
<td>Pending</td>
<td>CCB Comments (original CCB Objection 10th April 2017 as previously reported)</td>
<td>24.7.18</td>
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<tr>
<td>Land off Pyrton Lane Watlington</td>
<td>SODC</td>
<td>P16/S2576/0</td>
<td>Outline application for the erection of up to 100 residential dwellings including vehicular access, public open space, car parking, landscaping and drainage. (As amended by drawings and additional information received 20)</td>
<td>Pending</td>
<td>CCB Objection as previously reported</td>
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<td>Location</td>
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| Crowell Hill Farm, nr Chinnor | SODC | P18/S2682/O | Outline application incorporating access details for demolition of existing industrial (B2) buildings. Removal of concrete hardstanding and erection of 5 detached dwellings | Granted | CCB Objection as previously reported. 
Reason for consent given as: With regards the environmental dimension, the site occupies a sensitive location within the AONB adjacent to an Ancient Woodland and SSSI/SAC. However, given the existing use and associated built form at the site, I am of the view that the provision off up to 5 dwellings constitutes a more sensitive use of the site, and with an 8m buffer will ensure that the proposal will not have any significant adverse effect on the SSSI/SAC. Furthermore, a scheme can be sensitively designed to ensure that the natural beauty of this part of the AONB is conserved. The proposal will result in additional environmental benefits through the removal of HGV movements of this part of the highway network. |
<p>| Land Between Longwick Road &amp; Mill Lane Princes Risborough Bucks | WDC | 18/06916/O UTEA | Outline application (including details of access only, with all other matters reserved) for the erection of up to 360 dwellings. | Pending | CCB Objection as previously reported |
| Outline application for up to 37 Assisted Living Units, and provision of a Care Home (All C2 Use), 4 staff accommodatio n units and site access (all other matters reserved for future consideration) | SODC | P18/S0002/O | As clarified by alternative indicative layout and additional information accompanying Agents letter dated 18 June 2018. | Pending | CCB Comments as previously reported |</p>
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<tr>
<td>Navarac Oakley Wood near Nuffield</td>
<td>P18/S2357/FUL</td>
<td>Granted</td>
<td>24&lt;sup&gt;th&lt;/sup&gt; June 2019</td>
<td>Demolish existing residence and build new residence. SODC + Demolition of an existing workshop and sheds, construction of two new live/work units. CCB Comments as previously reported. Decision notes that 'The design and scale of the new buildings will not cause harm to the special landscape of the AONB'.</td>
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<tr>
<td>Abbey Barn Reserve Site</td>
<td>WDC 18/05363/FUL</td>
<td>Pending</td>
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<td>CCB Comments as previously reported</td>
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<tr>
<td>Bury Spinney Houghton Regis</td>
<td>PINS APP/P0240/W/18/3211 493</td>
<td>Appeal dismissed</td>
<td>27&lt;sup&gt;th&lt;/sup&gt; June 2019</td>
<td>550 dwellings</td>
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<td>CCB Comments as previously reported</td>
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<td>Appeal dismissed 27&lt;sup&gt;th&lt;/sup&gt; June 2019 (green belt reasons as given)</td>
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<td>Inquiry 14.5.19</td>
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<td>Land north and east of Glynswood High Wycombe</td>
<td>WDC 18/07274/OUT</td>
<td>Pending</td>
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<td>CCB Objection as previously reported</td>
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<td>Appeal against non-determination APP/J0405/W/19/3223510 Dismissed 12&lt;sup&gt;th&lt;/sup&gt; June 2019 (note CCB not consulted on the appeal). Dismissed on green belt</td>
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<tr>
<td>Land at Abbey View Primary Academy Kennedy Avenue Daws Hill Lane High Wycombe Bucks</td>
<td>BCC</td>
<td>BCC reference: CC/0017/18</td>
<td>Amendment to Condition 2 of consent CC/0017/18 relating to location of proposed MUGA on Site.</td>
<td>Pending</td>
</tr>
<tr>
<td>Penn and Tylers Green Football Club, Elm Road, Penn, Bucks</td>
<td>PINS</td>
<td>Planning Inspectorate reference APP/X0415/W/320397</td>
<td>Erection of 6 retractable floodlight columns (2.8m rising to 15m) and lamps to light a football pitch plus associated control cabinet.</td>
<td>Appeal allowed 16th April 2019</td>
</tr>
<tr>
<td>Demolition of existing buildings and construction of 2 x 4 bed and 4 x 5 bed detached dwellinghouse s</td>
<td>WDC</td>
<td>18/07701//FUL</td>
<td>Bockmer End at Land North East Of Old Barn Cottage Bockmer End Farm Bockmer Road Bockmer End Bucks</td>
<td>Withdrawn 4.4.19</td>
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<td>Bozedown Farm Hardwick Road Whitchurch On Thames</td>
<td>SODC</td>
<td>P19/S0113/ FUL</td>
<td>Five Winter Yurts</td>
<td>Pending</td>
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<td>Land adjacent to The Orchard, Benson at Braze Lane Benson</td>
<td>PINS</td>
<td>APP/Q/3115/W/18/3219295</td>
<td>Outline application for up to 19 dwellings with all matters reserved.</td>
<td>Appeal pending</td>
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<td>Application No.</td>
<td>Nature of Application</td>
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<td>Butterfield Technology Park, Great Marlings, Luton</td>
<td>LBC</td>
<td>18/01639/FUL</td>
<td>Erection of a commercial unit comprising 6,832sqm of B8 (storage and distribution) floorspace, together with associated car parking, landscaping, access, lighting and other works</td>
<td>Granted 28th Feb 2019</td>
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<td>Chiltern Gateway Centre, Dunstable Road, Whipsnade</td>
<td>DBC</td>
<td>CB/18/0479/9/full</td>
<td>Installation of a new car park machine</td>
<td>Granted 1st March 2019</td>
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<td>Site Of Chiltern Pools, Drake Hall, Community Centre, Amersham Library and Associated Car Parks and Part Of King George V Playing Fields Chiltern Avenue and King George V Road Amersham Buckinghamshire HP6 5AH</td>
<td>CDC</td>
<td>PL/18/4593/RC</td>
<td>Demolition of existing buildings known as Chiltern Pools, Drake Hall, Chiltern Youth Centre and Amersham Library (excl. Annex and Barn Hall) and construction of a replacement two-storey (plus part-lower ground floor) leisure, sports and community building (Use Classes D1 and D2), including 25m swimming pool, diving pool, multipurpose sports hall, squash courts, climbing walls, spa, library, community hall, fitness and gym</td>
<td>Pending</td>
</tr>
<tr>
<td>Sharpenhoe Road, Streatley.</td>
<td>CBC</td>
<td>CB/18/0434/7/</td>
<td>Proposed relocation of Sporting/Recreation facility (Sui Generis use) on behalf of BSSA (Shooting Range)</td>
<td>Application withdrawn 8.3.19</td>
</tr>
<tr>
<td>Location</td>
<td>Authority</td>
<td>Reference Number</td>
<td>Description</td>
<td>Status</td>
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<tr>
<td>Land adjacent allotment gardens</td>
<td>WDC</td>
<td>18/08068/FUL</td>
<td>Change of use of land to cemetery including administration building,</td>
<td>Pending</td>
</tr>
<tr>
<td>Queensway Hazlemere Bucks</td>
<td></td>
<td></td>
<td>maintenance storage area, car park and landscaping.</td>
<td></td>
</tr>
<tr>
<td>Litmore Shaw Grays Lane Ibstone</td>
<td>WDC</td>
<td>19/05120/FUL</td>
<td>Retention of an underground store, retaining wall and open fronted lean to</td>
<td>Pending</td>
</tr>
<tr>
<td>Bucks</td>
<td></td>
<td></td>
<td>store and installation of a ground source heat system (part retrospective)</td>
<td></td>
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<tr>
<td>Old Reservoir Greenmore Woodcote</td>
<td>SODC</td>
<td>P19/S0259/FUL</td>
<td>Change of use of land for siting residential caravans</td>
<td>Refused 16th May 2019</td>
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<tr>
<td>Marchmont Farm Hemel Hempstead</td>
<td>DBC</td>
<td>4/00045/19/MOA</td>
<td>Outline application for up to 350 dwellings and 5 gipsy and traveller</td>
<td>Pending</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>pitches.</td>
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<tr>
<td>Land Adjacent Lodge Lane Little Chalfont Bucks</td>
<td>CDC</td>
<td>Retrospective application for change of use to temporary residence and temporary use of touring caravan (3 year temporary use proposed).</td>
<td>Refused 1.3.19</td>
<td>CCB Objections as previously reported</td>
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<td>------------------------------------------------</td>
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<tr>
<td>CDC reference PL/18/4115 /FA</td>
<td></td>
<td>Change of use of land to mixed use site for use as a gypsy caravan site for traveller family, the use limited to the stationing of one static caravan, one touring caravan, and for equestrian purposes. Erection of barn, and provision of hardstanding, fencing, septic tank. (Retrospective)</td>
<td></td>
<td>Reason Two stating 'The site lies within the Chilterns Area of Outstanding Natural Beauty (AONB) where the primary objective is to conserve and enhance the natural beauty of the landscape as set out in Saved Policy LS1 of the The Chiltern Local Plan Adopted 1 September 1997 (including alterations adopted 29 May 2001) Consolidated September 2007 &amp; November 2011. Core Strategy Policy CS22 requires all proposals to conserve and or enhance the AONB and also protect the setting of and views onto and out of the AONB. This is consistent with para 172 of the NPPF says great weight should be given to conserving landscape and scenic beauty in areas of outstanding natural beauty. The development as a residential gypsy caravan site with the stationing of a mobile home and two touring caravan, extensive hardstanding and introduction of residential paraphernalia together with the introduction of close barded fencing has a significant urbanisation impact on the character of the area is considered harmful to the AONB and does not conserve it at all’</td>
</tr>
<tr>
<td>CDC reference PL/18/4436 /FA</td>
<td></td>
<td></td>
<td></td>
<td>21.12.18</td>
</tr>
<tr>
<td>Location</td>
<td>Authority</td>
<td>Reference</td>
<td>Permission Details</td>
<td>Decision Notes</td>
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<tr>
<td>Land at Holly House Harpsden Bottom Harpsden</td>
<td>SODC &amp; PINS</td>
<td>LPA references P18/S3724/DA and P18/S3725/DA PINS references APP/Q3115/C/18/3215 490 and APP/Q3115/C/18/3215 491</td>
<td>Without Planning permission the erection of various buildings and laying of hard standing areas in the approximate locations own edged blue and hatched orange respectively on the &quot;Topographical Survey&quot; annexed (Enforcement Notice Appeal on grounds a, f and g).</td>
<td>Appeal held in abeyance</td>
</tr>
<tr>
<td>Arla Foods Ltd Aylesbury Dairy, Samian Way, Aston Clinton Bucks</td>
<td>AVDC</td>
<td>19/00399/APP</td>
<td>Extension to dairy (Final Phase as approved by 11/0962/APP dairy consent - revised scheme) at</td>
<td>Pending</td>
</tr>
<tr>
<td>Bacombe Warren Bacombe Lane Wendover Bucks</td>
<td>AVDC</td>
<td>19/00328/APP</td>
<td>Demolition of two existing dwellings and outbuildings and construction of two dwellings, an office/workshop, parking and associated landscaping</td>
<td>Pending</td>
</tr>
<tr>
<td>Down House Ewelme</td>
<td>SODC</td>
<td>P19/S0006/FUL</td>
<td>Construction of a new poolhouse at Ewelme</td>
<td>Pending</td>
</tr>
<tr>
<td>Land at West Hemel (site allocation LA3)</td>
<td>DBC</td>
<td>4/03266/18/MFA</td>
<td>Hybrid planning application for mixed use proposed development at west Hemel Hempstead, pursuant to policy LA3 of the adopted site allocations development plan document (2017) to provide for up to 1100 dwellings (with up to 40% affordable housing), comprising full planning proposals for 350</td>
<td>Pending</td>
</tr>
</tbody>
</table>
dwellings and outline planning proposals (including means of access) for 750 dwellings.
## New CCB Responses on Planning Applications since Last Planning Committee

<table>
<thead>
<tr>
<th>Location</th>
<th>LPA</th>
<th>Ref. No.</th>
<th>Development</th>
<th>Status</th>
<th>Summary of the Board’s Response (please contact the Board for more detailed information if this is required)</th>
<th>Date</th>
</tr>
</thead>
</table>
| M1 junction 11a to A6 Barton Road Sundon Chalton Streatley | CBC  | CB/19/00887 /FULL | Construction of a new single and dual carriageway 2.75 miles (4.4km) road linking the M1 and the A6 between the M1 junction 11a and the A6Barton Road. Comprising intermediate junctions, overbridges, underbridges, cycle paths, revisions to the Public Rights of Way network, drainage and landscaping | Pending | CCB Objection and request to Secretary of State to call-in the application  
Our key concerns are as follows:  
1. Prematurity to the Central Beds Local Plan  
The M1-A6 link road (the subject of this planning application) is a departure from adopted development plan policy. The M1-A6 link road and adjoining up to 4,000 homes and 20ha employment land are the subject of proposed strategic allocation SA1 in the emerging Central Beds Local Plan. The plan has been submitted for examination and the matter of North of Luton is timetabled to be discussed at the examination on Wednesday 12 June 2019 (Matter 6 Issue 4). There have been objections as the proposals involve conflict with national policy on Area of Outstanding Natural Beauty (AONB) and Green Belt, as well as concerns about transport implications, ancient woodland, biodiversity and the local loss of rural amenity among other considerations.  
Central Beds Council is the applicant, scheme promoter and the determining local planning authority. This presents a potential conflict of interest. Safeguards are needed. The application should not be determined before an independent process has taken place. In this case, there is very soon to be such an opportunity for independent examination through the local plan. Therefore, this planning application should not be determined before the receipt of the Inspectors’ Report on the Central Beds Local Plan, and only permitted if the Inspectors find Policy SA1 to be sound. | 13.5. 19 |
2. The plans do not conserve and enhance the natural beauty of the Chilterns AONB

1.6 km of the new M1-A6 link road runs through the Chilterns AONB, and the other 2.8 km not in the AONB is within the setting of the AONB. The road will bring noise, air pollution, light pollution and visual intrusion to the AONB. It will not conserve the natural beauty of the AONB (i.e. keep it the same), nor will it enhance it (make it better). The NPPF para 172 establishes that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues, equal to National Parks.

3. Major development in the Chilterns AONB

The proposed road is a large piece of new infrastructure, stretching for 4.4 km and consisting of part-single carriageway and part-dual carriageway. This is more than estate road for a new development area. The development is clearly major development in the Chilterns AONB, to which government policy in NPPF paragraph 172 applies: “Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.”

The Chilterns Conservation Board does not consider that the case made in the Planning Supporting Statement for the application demonstrates exceptional circumstance or public interest. Furthermore the scheme does not convincingly pass any of the three considerations in para 172: a) need, b) alternatives outside the AONB, and c) scope for mitigation of detrimental effects on the environment, the landscape and recreational opportunities.

4. Landscape and visual impacts
The proposed routing of this road would permanently and adversely affect the Chilterns landscape. The Planning Supporting Statement acknowledges at para 4.4 that the LVIA shows that:

- 'the sensitivity of the landscape means that overall there would be moderate adverse landscape effects on the Chilterns AONB' 

- 'the alignment would remain prominent in the landscape, cutting across the grain of the rolling topography.'

- 'Large Adverse effects for users of the Public Rights of Way (PRoW) network on Galley Hill and Warden Hill and from PRoW that cross or run alongside the Scheme, would however remain as the views for these receptors have open views along or over significant lengths of the Scheme.'

There is no shying away from the fact that this scheme is harmful to the nationally protected landscape. It is not possible to offset harm to nationally protected landscape, once gone it cannot be recreated elsewhere. Harm should be avoided and mitigated, following the government's mitigation hierarchy. The road has not been designed to remove or adequately mitigate the harm, because this would compromise scheme objectives (Planning Supporting Statement section 4.4).

For example, the view along the new road from Galley and Warden Hills SSSI in the AONB is of major concern. A new roundabout would connect the new road to the A6. This would be in clear view from the AONB, including elevated views from Galley and Warden Hills. The alignment of the alignment exacerbates the problem, and it fails to learn the lesson from another example of a new main road below a key elevated public viewpoint in the Chilterns AONB (Coombe Hill in
Buckinghamshire where the view has been harmed by the A413 link road)

5. Increased traffic through the AONB

6. Noise

7. Lighting

8. Protection of chalk aquifer

9. Rights of way impacts

Closure and diversion of footpaths during construction would interfere with public access to the AONB and enjoyment of it.

10. Future road pressures in AONB

The M1 to A6 link road is just one part of an outer Luton ring road, with the Houghton Regis section to the west now completed. The approval and construction of the M1 to A6 link road would inevitably bring future pressure for a further road to link the A6 to the A505. This is likely to run through the Chilterns AONB and be extremely harmful. By planning this incrementally, the impacts of the whole are not being assessed, and the proposal is not being looked at as an NSIP.

11. Cumulative impacts

The planning application for the link road cannot be assessed in isolation. This proposal requires a detailed assessment of the potential pressures on the AONB in which further road building and other development pressures are unlocked by this scheme and the necessary assurances that such impacts can be mitigated or avoided. The impacts of the road, housing and employment growth can and should take place through the forthcoming local plan examination. We have never seen a project where there is a clearer case for proposals to be assessed together to ensure that in-combination and cumulative effects are understood.
<table>
<thead>
<tr>
<th>Case Study</th>
<th>Authority</th>
<th>Reference</th>
<th>Description</th>
<th>Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>22 &amp; 24 Chapel Road &amp; Land To The Rear Of 26 &amp; 16 Chapel Road Flackwell Heath Bucks</td>
<td>WDC</td>
<td>18/05414/OUT PINS reference APP/K0425/W/18/3218628</td>
<td>Planning Appeal against the non-determination of outline application (all matters reserved accept for access) for the redevelopment of site comprising erection of 950m² of B1 office space and the erection of up to 22 affordable housing units and associated works including demolition/clearance of existing commercial uses on site</td>
<td>Pending</td>
</tr>
<tr>
<td>Abbey View Primary Academy Kennedy Avenue Daws Hill Lane High Wycombe</td>
<td>BCC</td>
<td>AOC/0027/19</td>
<td>Application to discharge condition 11 (lighting) of consent CC/0017/18 for the development of a new two storey primary school, pre-school and associated development – additional details.</td>
<td>Pending</td>
</tr>
</tbody>
</table>

**CCB Written Representations.**

Previously the CCB raised objections to the previous application for outline consent (including details of access) to relinquish all the commercial uses on the site and redevelop the site for wholly residential purposes (refused under reference 16/06063/OUT and dismissed on appeal under reference APP/KO425/W/17/3167425).

CCB raised objection on AONB grounds. The planning inspector dismissed that appeal on Green Belt grounds and did not find any AONB grounds for dismissal. We accept that this is a material planning issue in the determination of the current application. With regard to our duties and the Board’s purposes as stated in section 87 of the Countryside and Rights of Way Act 2000 (CROW Act), the CCB acknowledges that the planning appeal is material to a determination on AONB grounds. The matter of Green Belt policy, therefore, is the principal issue for determination and this remains before the appointed Inspector but is a matter outside our duties and purposes under the CROW Act.

**CCB Comments**

We have also reviewed the report submitted on lighting that accompanied application CC/0017/18 (David Bedwell and Partners). We concur with the general points made here and in the supplementary note to the current application that light spill to the south must be resisted and best practice adopted.

Set against this background and the policy environment (as below) CCB would comment that:

(a) Submitted Drawing D35235/TF/C is difficult to understand. As a technical plan it needs a supplementary plan or annotation with the denoted column/type and area of spill or the radius of lighting as indicated.

(b) If we have understood the plan correctly then 41 lights are to be installed and the car park area has 10 column mounted lights.
<table>
<thead>
<tr>
<th>Amersham School, Stanley Hill, Amersham</th>
<th>BCC</th>
<th>CC/0013/19</th>
<th>Pending</th>
</tr>
</thead>
</table>

### CCB Comments

CCB would draw attention to the Chilterns Buildings Design Guide as the use of materials and design features will be an important consideration in the application of the decision-making duties as set out previously. The applicant’s architects have set out a clear design narrative and the Design and Access Statement comprehensively sets out the site improvements and the extent to which the orientation and landscaping improves the overall relationship to the AONB. Indeed the views from within the footpaths / public rights of way are improved by this relationship to the site and its contextual relationship within the urban area that adjoins this highly valued and nationally protected landscape.

The design of N block exhibits many fine points of detail, including hopper heads rainwater goods and matching transoms and mullions and recessed window details to set the glazing within the elevation. Such carefully crafted details lead us to believe that the use of Brick Synthesis S01 and

(c) A condition is proposed for an automatic cut-off between 2300 and 0700. CCB would comment that the cut off should be seasonal and dictated by the school calendar, outside of necessary security lighting. The car park lighting is geared to ensure little upward light spill. It would be preferable, within the car parking area, to use a ground based system to permit orientation to the main building and with safe routes denoted for the children. The Solar Eye 80 system offers a potential design exemplar here and we would ask the LPA to consider that option. This would permit way-finder lighting within the car park and can minimise the need to light the entire area by a column mounted system. We accept some column mounted lighting may be needed but such a blended solution avoids the more floodlit appearance on the urban edge that is visible from higher ground to the south.
| Britwell Road and south of Cuxham Road Watlington | SODC | P19/S0818/O | Hybrid application comprising: (1) Full planning permission for the demolition of the existing pig farm and its associated buildings; the erection of 183 dwellings (Use Class C3)  
(2) Outline permission for up to 650sqm of Use Class B1(a) floorspace with access and all other matters reserved | Pending & parallel appeal | CCB Comments and part objection (higher housing numbers and lack of appropriate lighting design)  
(1) The panoramic views from Watlington Hill are impressive and much public benefit is derived from this open access National Trust site. Watlington as a settlement nestles within those views, when viewed from within the AONB and a special quality is derived from that relationship. Put another way 'edge' development must be treated with great care as it has the potential to erode and harm that relationship. CCB accept that this is a site in the Neighbourhood Plan and the assessor’s recommendations took on-board CCB comments to strengthen that relationship by taking into account policy wording that protected the setting of the AONB. The Neighbourhood Plan fully acknowledges that contextual relationship between town and AONB / wider setting. CCB considers setting to be a highly material issue in this case. The principal planning issue for us is, therefore, the extent to which the greater number of dwellings and the consequential configuration of development impacts upon these wider views  
(2) A matter largely unresolved is the impact of lighting. The EDP updated addendum which accompanied the amended plans (August 2018) struggles to assure on this point. A lighting plan is now submitted and denotes the radii of impact around each column. This confirms the impact of lighting on the reserved bypass road and illustrates that its linear configuration would, in our  

| 12.4.19 |
judgment, be readily apparent in wider views from higher ground. The previous point as to 'edge' development would be readily apparent as the lighting to the western boundary is somewhat regimented in its configuration. The EDP addendum accepts that lighting will exert a *high magnitude of change* and that this would yield a *moderate / minor* level of effect. The consultants justify this on grounds that the site is already allocated and any new development will have an impact and that this is not a defined dark sky area. Further they offer controls such as dimmable technology and lighting curfews for the 15 years of greater visibility before planting takes effect. Dimmable lights and lighting curfews are unenforceable under the tests of a planning condition (NPPF paragraph 55 and Planning Practice Guidance paragraph: 003 Reference ID: 21a-003-20140306).

(3) CCB would ask the Inspector to consider the impact of lighting and its resolution by detailed design and layout reassurances or amendments. The ILP guidance attributes great importance to AONB and National Park landscapes, giving them dark skies status. The site is within the hinterland of the AONB and its setting. The site is within a valued landscape and a close relationship is established to the AONB. The western boundary is now viewed as *more robust* by the applicants (as mentioned in the EDP addendum in its para 2.0). That point refers to the number of trees planted and not the width of the buffer and treatment of the outer western corridor. When viewed from the AONB on higher ground the lighting would still be prominent. The fundamental problem is that the western corridor of the site is too narrow, containing both the new road and the additional quantum of development as now sought. The Parish Council at application stage, whilst supportive of the principle, raised a number of points on lighting and the need for a very high quality
of design thinking. In resolution of this matter CCB promotes revisions as previous put to reduce the amount of development in the western corridor area. Additionally and importantly best practice must be adopted with non-columnar based lighting designs (intelligent road studs) and a road layout that avoids the strictures of top-lit and floodlighting around roundabouts, for example (which may be deemed appropriate at the junction). We are aware of new technologies that reduce light spillage by up to 98% (solar eye 80) and case studies at the Olympic Park in Stratford, City of Bristol and cycling routes in sensitive environmental locations around Cambridge. Whilst CCB cannot propose a particular manufacturer or technology type, the current scheme promotes a traditional treatment that is both inappropriate and harms the setting of the AONB. CCB promotes reflection and a rethink here.

### Arla Foods Ltd
Aylesbury Dairy, Samian Way, Aston Clinton Bucks AVDC reference Amended Plans Consultation June 2019

<table>
<thead>
<tr>
<th>Arla Foods Ltd</th>
<th>AVDC</th>
<th>19/00399/APP</th>
<th>Extension to dairy (Final Phase as approved by 11/0962/APP dairy consent - revised scheme)</th>
<th>Pending</th>
<th>CCB Holding Objection (original application) and comments (additional details).</th>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Aylesbury Dairy, Samian Way, Aston Clinton Bucks AVDC reference Amended Plans Consultation June 2019</td>
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We would seek further information on the following:

1. A measure of clarification on the exact changes to the south east elevation of the proposal, when compared to the existing approval. This could be clarified by a simple overlay drawing. If we have understood correctly the submitted drawings, the section denoted 212 to EX 69 (or 53 to 68) in the elevation proposals for phase 3 is 26 metres high and therefore sits materially above the existing buildings (some 22/23 metres high). This building, therefore, has potential to appear out of context and much higher in wider views. We see that a pre-application has been held but could not see reference to the details of it in the papers.

2. That weight and attention is given to wider views from within the AONB. The planning statement does not deal with the AONB impacts and no landscape assessment is submitted. Previous applications here have

24.6.19
considered these impacts. The existing Arla development is apparent from Coombe Hill and within the Chilterns AONB and looking beyond its boundary. The Officer’s Report to Committee for the original application (11/00963/AOP) dealt with this relationship as (at 9.84) ‘In terms of long range views from the Chilterns AONB, the closest is from the Upper Icknield Way, however, whilst it is evident that the site will be visible in the mid ground, it is considered that these views are sufficiently panoramic that the proposed development will only occupy a small part of this much wider, more expansive landscape view. Moreover, the cladding strategy using mid-range hues to be adopted will ‘break up’ the mass of the buildings in the landscape. Overall, on balance, whilst the site involves the erection of a large scale building within a substantial site which will be visible, it is reasoned that the long range views from the Chilterns AONB of the site would be seen within the context of the wider landscape and that the proposal would not cause unacceptable harm to the setting of the Chilterns AONB. With mitigation the effect would be reduced from moderate negative and a minor significance as outlined in the ES’ (and continues). When discharging reserved matters of appearance, layout and scale the applicants then Design and Access statement stated that at its paragraph 4.2 that ‘views from the surrounding land are limited particularly from higher land to the far south but still require careful consideration with respect to scale and general building design but particularly to

(3) Clarification as to external lighting and the promotion of minimum lighting and best practice, as applies
(4) That the consented Aylesbury Woodlands expansion WDC(16/01040/OUT) is material here, when assessing cumulative change and mitigation.

By reducing the scale of phase 3, the applicant’s would achieve a more
| Ashwells Field Cock Lane Tylers Green Bucks (amended details - access / revised layout) | WDC | 18/05002/R9 | Outline application for the erection of up to 102 dwellings. The application includes details of access (site access, estate roads and widening of Cock Lane) and landscaping (public open space and communal areas only) | Pending | **CCB Comments**

The site sits within the High Wycombe Settled River Valley Landscape Character area and is rightly acknowledged as falling within the setting of High Wycombe, with intervening woodland, farmland and parkland. By the same measure the site at Ashwells falls within the setting of the AONB to the east (some 250 – 500 m distance). The applicant’s aspiration, as set out in their Design and Access Statement proposes housing within a strong landscape framework, with the promotion of local vernacular and the use of design coding. This is consistent with some of our previous comments on the draft Development Brief. The design thinking here is to create a hillside park, which is an important component of landscape setting. CCB would comment as:

1. The landscape statement proposes the burying of power lines and we deem this a matter of considerable importance. This land use objective has clear benefits and should be a matter for a suitably worded planning condition.
2. The landscape statement reports that consultation on the draft development brief resulted in an expressed view that density does not exceed 25 dwellings per hectare. Again this is a matter for planning condition and also links closely to the landscape led strategy as advanced.
3. We are aware that the landscape statement considers there to be ‘no intervisibility’ to the AONB (para 6.2.10) but does accept that National Character Area 110 covers the site and the wider AONB (6.2.13).

Looking beyond the Ashwells site to the wider area within the Development Brief the undeveloped slopes and valley bottoms together with their woodland planting fit with the landscape character of the wider Chilterns.
| Askett Nurseries Aylesbury Road Askett Bucks | WDC | 19/06137/FU L | Erection of 1 x 5-bed detached dwelling with study room, 1 pair of 2-x 3-bed semi-detached dwellings with integral car ports & 1 pair of semi-detached dwellings comprising 1 x 4-bed & 1 x 3-bed dwellings (5 in total) with associated access, parking and landscaping following the demolition of all existing buildings | Pending |

Chilterns, which also includes LCA 22.1 Beaconsfield Mixed Use Terrace, in neighbouring South Bucks District. Roads like Cock Lane exhibit a distinctively Chilterns rural character. This character will be lost. Correspondence on the WDC planning portal between County Highway and local planning author and the applicant’s consultant proposes some widening. This would be detrimental to landscape character. Cock Lane is an ancient and attractive rural lane through woodland, it is unsuitable for additional traffic and should not be upgraded. Ideally it should be closed to traffic and turned into a walking and cycling green infrastructure route which would be compatible with its character and add public benefit.

The site is part of a wider identified green corridor (as included in the Bucks Green Infrastructure Strategy) connecting the AONB on the eastern side of High Wycombe with the AONB on the northern side of High Wycombe, flowing through the Gomm Valley, King’s Wood and Terrier Farm. This habitat connection must be retained not severed. Future management of the chalk grassland open space is ‘reserved’ in the revised Design and Access Statement. This will need to be resolved and had implications for any s 106 heads of terms as such management and habitat creation should be the subject of a suitable endowment.

**CCB Comments**

On planning principle CCB accepts that a part of this site is previously developed land (PDL). In that assessment we have applied the definition in the NPPF glossary, i.e. that PDL applies within a curtilage of developed structures and excludes land for agricultural use. Thus part is PDL and part open undeveloped land (horticultural use within the definition of agricultural use in s 336 of the TCPA 1990). For that reason the principle of redevelopment applies to some but not all of the land. In view
of the sensitivity of the location within the Risborough Chalk Foothills landscape Character Area (LCA), it is important that this proposal is sympathetic to and enhances the landscape character of the AONB as is required by the Development Plan, s 85 duty in the CROW Act and the NPPF at 172. The fact that development straddles the road here is a feature within this LCA and presents an opportunity for enhancement with the correct configuration and a limited amount of development.

The starting point must be the conservation and enhancement of the special qualities of the AONB. The LCA is a material consideration of critical importance because all of the application land falls within the Risborough Chalk Foothills landscape and the site contains common features, notably a strong series of boundary treatments and some open views across the landscape.

This application appears to have been the subject of much pre-application discussion resulting in a reduction from 10 to 5 dwellings and the adoption of a design approach to replicate a Chiltern’s farmyard in appearance. The Chilterns Design Guide (CBDG) is mentioned by the LPA, yet it is not entirely clear that this scheme has fully considered it. The summary matrix at the end of the Landscape and Visual Impact Assessment (LVIA) at B3 notes the importance of landscape character and visual impact but questions the top heavy roofing and the need for design to be in accordance with the CBDC. We would welcome further commentary on matters of design detail in light of the CBDG and also consideration of the land edged blue and its future control. Whilst we appreciate that much design discussion has already taken place there is still a need to consider the CBDG.

<table>
<thead>
<tr>
<th>Aston Hill Place Aston Hill Chivery</th>
<th>AVDC</th>
<th>9/00679/APP</th>
<th>Demolish existing house and erect</th>
<th>Pending</th>
<th>CCB Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(1) The materials proposed involve sandstone blocks. Sandstone is not a</td>
</tr>
</tbody>
</table>
Aston Clinton, Bucks.

replacement detached dwelling at

traditional or typical material in the Chilterns and we refer here to the Chilterns Buildings Design Guide (CBDG) and the Supplementary Technical Notes on materials. The supporting design and access statement refers to Halton House, however this is an ashlar stone with slate roof and not sandstone. Whilst the Chilterns Buildings Design Guide allows for design innovation, it is important (subject to ii below) that these materials appear appropriate and an assessment is required of the wider visual impact.

(2) On landscape impact we acknowledge the essentially brownfield / previously developed character of the site. Clearly the applicant’s are seeking to visually improve upon the existing site configuration. A proportionate landscape and visual impact assessment and commentary are also welcome. An appraisal consistent with the GLVIA 3rd edition methodology is welcome and can be a proportionate study but will assist in the determination of this application.

(iii) The site is bordered by the Dancers End SSSI, with the Chilterns Beechwood SAC further beyond. CCB would seek enhancements within the application site as promoted by the AONB Management Plan 2014 – 2019 biodiversity chapter sets the principle broad aims to • Conserve and enhance the wildlife value of all habitats. • Enhance ecological networks so that they are bigger, better, more resilient, joined up and dynamic. • Ensure that the wider benefits of the natural environment are understood and recognised. • Encourage more people to develop a greater understanding of and involvement in wildlife conservation.

Blenheim Farm Icknield Way near Crowmarsh.

SODC P19/S0441/FUL Conversion of former commercial Pottery Barn to form a single dwelling, together with associated parking and vehicular access amendments

Granted 17th April 2019

CCB Comments

CCB would make two comments:
(1) That saved Local Plan Policy E8 Re-use of rural buildings will apply and that criterion (i) (ii) and (vii) applies here. This policy is echoed in the text to the Chilterns Design Guide. (i) states of such structures that 'they are of permanent and
substantial construction and are capable of conversion without major or complete reconstruction’ and (ii) ‘that their form, bulk and general design are in keeping with their surroundings’; (vii) states that ‘In the case of proposals for residential use, other uses have been explored and found to be unacceptable in planning terms’.

(2) CCB would draw attention to the Chilterns Buildings Design Guide (CBDG) as the use of materials and design features will be an important consideration in the application of the decision-making duties as set out previously. The ‘inspiration images’ (1238-P) are carried through into the proposed design with use of vertical timber cladding and fenestration within that frame. Chapter 5 of the Buildings Design Guide applies here and provides a useful checklist, which will constitute a material planning consideration.

Chiltern Hills Academy
Chartridge Lane
Chesham Buckinghamshire HP5 2RG

Provision CC/0012/19

Proposed expansion works at Chiltern Hills Academy include a new purpose build science block, extensions to the existing Sports Hall block with additional 6th Form classrooms on the first floor and English block extension proposals. The proposals also address the deficiencies of the existing school accommodation through refurbishment of several other areas within the school. Externally, the proposals include an expansion to existing car park areas and the re-provision of external hard play and sports area

Pending

CCB Comments

(1) Design - The design of the sports hall and new science building to the south and the treatment of the southern boundary, including the overall profile of development facing southwards, constitute the principal issue when assessing the impact upon the AONB. The necessary preconditions here to conserve the setting of the AONB will require that the new buildings and the associated boundary treatment enjoy a visual harmony with the nationally protected landscape that lies beyond. The use of a Cholesbury dark red multi brick is appropriate and reinforces the existing design treatment whilst promoting a high quality finish. The LVIA’s conclusion as to the settings impact in L7 of the AONB Management Plan appears fair, as does the assessment of visual impact (table D1) and magnitude of change (D2).

(2) Materials - The high quality of this proposal and the use of the Cholesbury Multi would deliver the duty to conserve the special qualities of the AONB in section 85 duty and in CS 22 in the Local Plan. The overall conclusion in the LVIA as to a
neutral impact (from the vantage points of the PROW networks) represents an appropriate conclusion. However the duties in s 85 of the CROW Act require that regard is paid to the conservation and enhancement of the AONB. In our judgment this is achieved as a result of the design of the southern end of the site and the choice of a very well chosen brick.

(3) Boundary treatment - We see that the southern boundary is not the subject of tree removal (as is proposed at other parts of the site). The landscape plan in the Design and Access Statement (section 4) denotes tree planting outside the red line boundary (to the south). This will require clarification. The southern boundary is partially embanked and any fencing could be secured within that to lessen the wider visual impact. We understand the need for security and a 1.5 m palisade fence is proposed. The Chilterns Buildings Design Guide (page 42) offers advice here. We recommend that a native hedge is planted outside the fence line, to conserve the boundary treatment and that a wooden palisade alternative be considered here. This can be the subject of an appropriately worded planning condition. To facilitate this fencing may need to be pulled slightly into the site boundary.

(4) Lighting – The landscape plan (electrical services – existing lighting strategy) indicates a ‘consistent lux – 15 lux’ for the 66 parking spaces to the northern side of the site. We understand the need for security lighting but would oppose a large area bathed in floodlighting, as this would negatively impact on the AONB and its recreational benefits when viewed from footpath CHS/4/1 and the nearby quiet cycle route. As with future details of boundary treatment these matters can be reserved for future consideration in the discharge of a planning condition. We promote best practice here and consideration of new ways of lighting paths as demonstrated in the technology advanced in the Solar
### Gomm Valley Reserve Site

<table>
<thead>
<tr>
<th>WDC reference</th>
<th>Outline application (including details of main accesses only) for mixed use development on 57.7ha of land providing for the phased delivery of: residential development of up to 1000 dwellings (Use Class C3); a single form entry primary school and pre-school/nursery (Use Class D1, up to 1200 sqm); retail facilities up to 1800 sqm (Use Class A1, A3, A4, A5); employment facilities up to 2000 sqm (Use Class B1); sheltered housing complex (Use Class C2, up to 4100 sqm); community and leisure facilities up to 1100 sqm (Use Class D1/D2) together with supporting infrastructure, landscaping, sustainable urban drainage, public open space including swimming pond and ecological areas.</th>
<th>Pending</th>
</tr>
</thead>
</table>

#### CCB Objection

CCB raises objection on a number of grounds. In summary these are:

1. The views from the AONB at the Hammersley Road would be significantly negatively affected by the development, substituting a strikingly attractive panoramic view of an undeveloped valley with urban development. The height of buildings as proposed is excessive for the landscape. The indicative design with timber and large areas of glass on elevations could harm the AONB by causing glint and glare in daytime and light spill at night.

2. The quantum of development is much too high. Additional recreational pressures will impact here and prevent appropriate management of the chalk grassland SSSI by means of conservation grazing.

3. The buffer to the Gomm Valley SSSI is too small. The new road punctures and severs the Ancient Woodland and the Deciduous Woodland Priority Habitat block on the western slopes.

4. The 2 development parcels on the western slopes should be deleted so that the road does not go as high into

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Eye 80 system, for example. The AONB has a dark skies status as recognised in the Institute of Lighting Professional (ILP) Guidelines (2011) Guidance Notes for the Reduction of Obtrusive Light. Great weight must be given to the importance of avoiding unnecessary and/or intrusive light spillage.

Therefore light spillage and excessive flood lighting must be avoided. For that reason no illumination can be permitted to the sports pitch and netball court that sit at the very southern end of the site, within its most sensitive location in proximity of the AONB boundary. We note the sports pitch is not a part of this application and will follow under a separate planning application.
the site, severing the woodland habitats.

(5) Cock Lane is an ancient and attractive rural lane through woodland, it is unsuitable for additional traffic and should not be upgraded. This lane should be a public route only.

(6) The development as proposed would destroy a local wildlife site in the southern eastern area of the site to create a road an housing development. This same land is also identified as Priority Habitat on DEFRA’s magic maps as being Priority Habitat Inventory - Lowland Calcareous Grassland (England) in a continuous belt with the Gomm Valley SSSI.

(7) The Lawton Principles derived from the report ‘Making Space for Nature’ promoted ecological networks and connectivity. This is consistent with the NPPF 170. The application does not incorporate these principles and hampers habitat connectivity.

(8) The site is part of a wider identified green corridor (see Bucks GI strategy) connecting the AONB on the eastern side of High Wycombe with the AONB on the northern side of High Wycombe, flowing through the Gomm Valley, King’s Wood and Terrier Farm. This habitat connection must be retained not severed. It cannot be retained with the development as proposed.

(9) The main estate road would sever a mature attractive hedge/woodland belt north of Peregrine Business Park.

(10) The enjoyment for users of the footpath network, including walks connecting High Wycombe residents to the AONB would deteriorate.

<table>
<thead>
<tr>
<th>Langlands</th>
<th>AVDC</th>
<th>19/00842/APP</th>
<th>Demolition of existing single storey dwelling and related outbuildings and the construction of a new two storey detached dwelling house at</th>
<th>Pending</th>
</tr>
</thead>
</table>

**CCB Comments**

(1) That the design matters here link to the principle of development, on the assumption that an existing residential property is being redeveloped. We understand that a certificate of lawfulness has been granted for residential development. The design proposed is supported by a strong ethos in the design and access statement. The linear
|   |   |   |   | orientation and minimal site excavation is justified. The materials refer to Chilterns design principles in the Chilterns Buildings Design Guide (richly patinated handmade bricks) and vertical timber cladding). CCB would welcome brief commentary on the use of Chilterns sourced bricks and cladding consistent with the Design Guide (see the Brick Technical Note and Roofing Technical note in particular). We would recommend reassurance as to the provenance and design of materials, consistent with the design guide. Dark stained timber is more typical of the wider Chilterns.

(2) On landscape impact we acknowledge the essentially brown-field / previously developed character of the site. Clearly the applicant’s are seeking to visually improve upon the existing site configuration. A proportionate landscape and visual impact assessment and commentary are also welcome. The site sites within the Landscape Character Type (LCT 11) Chalk Escarpment of the AONB and which states that this is ‘An area of great sensitivity and a high quality landscape, reflected in its current status as lying within a designated Area of Outstanding Natural Beauty. The area is also popular because it affords long distance views over the Vale landscape and to the fringes of Milton Keynes to the north’. An appraisal consistent with the GLVIA 3rd edition methodology is welcome and can be a proportionate study but will assist in the determination of this application.

(3) The site is bordered by the Dancers End SSSI, with the Chilterns Beechwood SAC further beyond. CCB would seek enhancements within the application site as promoted by the AONB Management Plan 2014 – 2019 biodiversity chapter sets the principle broad aims to • Conserve and enhance the wildlife value of all habitats. • Enhance ecological networks so that they are bigger, better, more resilient, joined up and dynamic. • Ensure that the wider benefits of the natural environment are understood and
<table>
<thead>
<tr>
<th>Location</th>
<th>Authority</th>
<th>Reference Number</th>
<th>Description</th>
<th>Decision</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Long Yard, Dunstable Road, Studham near Dunstable.</td>
<td>CBC</td>
<td>CB/19/00791/FULL</td>
<td>Erection of 32 residential dwellings and demolition of farm buildings</td>
<td>Pending CCB Objection</td>
<td>31.5.19</td>
</tr>
<tr>
<td>Land At Longwick Road Princes Risborough Bucks.</td>
<td>WDC</td>
<td>19/05738/CONSU</td>
<td>Formal request for a scoping opinion under Regulation 15 of the Environmental Impact Assessment Regulations (2017)</td>
<td>Pending CCB Scoping Opinion</td>
<td>12.4.19</td>
</tr>
</tbody>
</table>
the recreational pressures on the Chilterns Beechwoods SAC at nearby Ashridge – reference as below).

**Lighting**
The scoping report acknowledges a significant lighting impact. Indeed, any lighting will have an urbanising effect on views upon surrounding visual receptors. The implications for distant views from receptors within the AONB, including Brush Hill and Whiteleaf, will be important. A detailed lighting study and mitigation strategy would need to be fully set out.

**HRA Assessment**
As mentioned above we recommend a HRA geared or compliant approach to assess recreational impacts on the nearby SACs, similar to that produced with reference to the Marchmont Farm application (detailed above).

<table>
<thead>
<tr>
<th>London Luton Airport</th>
<th>LBC</th>
<th>19/00428/EI A</th>
<th>Application to vary condition 10 of planning permission 15/00950/VARCON for a temporary period (to the end of 2024) to enable the area enclosed by the 57dB(A) daytime noise contour to increase from 19.4 sq km to 23.4 sq km and the area enclosed by the 48dB(A) night time noise contour to increase from 37.2 sq km to 44.1 sq km.</th>
</tr>
</thead>
</table>
|                      |     |             | **CCB Holding Objection**  
The arguments put here appear to be set within the reasonableness of the planning condition (i.e. the incentive or disincentive it gives the operator), the precision of the conditions and (in our opinion) the enforceability of the condition. The now agreed variation of condition 11(i) allows some 6,400 (15%) of all movements to potentially violate the 76 dBA threshold. That means that 85% will comply with this threshold or 36,266 movements. Put another way, 6,400 will potentially violate out of 42,666 movements. During that (now approved) application CCB made the point that the majority of operators satisfied the condition. In particular it is important to know just how the overlapping impact between these two conditions impacts as presumably condition 11 allows violations about the limits as now sought.  
For this current application CCB places great weight on the need to conserve and enhance the AONB. Any manifest and tangible longer term reduction in the noise environment and with appropriate enforcement would be well worth considering.

10.5.19
targets are to be welcomed in a complex case such as this. The applicant’s case is, as we understand it, is that by 2024 less noisy aircraft will deliver the original planning objective against a growth model that has reached 18 MPPA ahead of the original 2012 forecasting.

CCB raises a holding objective on 3 principal grounds that
(1) There is no spatial assessment as to impact in association with a numeric impact as to dwellings. CCB would want to be reassured that the spatial extent as to impact does not impact upon the AONB as aircraft noise will be increased during at least 4 months of the year over the proposed 6 month period. Further, these months are during the busier summer months when days are longer and people recreate in the AONB and enjoy the tranquility of the landscape as an essential component of its natural beauty. CCB would seek additional details as plotted on a plan or map.
(2) That in striking a balance of issues (as the applicant’s seek to do) the local planning authority must give greater weight to the environmental sensitivity of the impacts. The s 85 of CROW and NPPF 172 duties (as above) indicate this, notwithstanding the significant environmental constraints in the Development Plan at LLP6. We seek a commentary on the environmental impacts of approved condition 11 as it overlaps condition 10. The cumulative assessment of impacts must be assessed here. CCB would seek a commentary on this matter.
(3) CCB would want to also be reassured that the mooted airspace changes (on page 11 of the planning statement) result in a more favourable impact on the local environment, including airspace changes over the AONB. These changes should be reported in this application as they are also material to the planning issues. CCB would seek further details.
(4) If the local planning authority is minded to permit this variation then, alongside all other key duties, great
weight must be given to Development Plan policy LLP6 (vii) so that a tangible and measurable longer term improvement is achieved in quality of life and tranquillity in the environment as affected. Such commitments will need to be easily understood and clearly enforceable within the planning system. The operator will need to set out the delivery schedule for these quieter aircraft and reassure that the cumulative impact of greater numbers in no ways offsets these evolving technological improvements. As far as the application is currently constituted there is insufficient information upon which to make a decision under LLP6 (vii) and bodies like the CCB who enjoy a statutory duty to conserve and enhance the AONB seek greater detail and assurances, as set out above.

<table>
<thead>
<tr>
<th>Muzwell Farm Barn Moor Common Lane End Buckinghamshire WDC</th>
<th>WDC 19/05621/FUL</th>
<th>Conversion of existing barn to 1 x 3 bed dwelling house with associated external alterations, detached bin store and landscaping at</th>
<th>Granted 10th June 2019</th>
<th>CCB Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
<td>CCB has been alerted to this application. We did not comment on the previous application, the subject of a refusal and subsequently dismissed on appeal (under reference APP/K0425/A/10/2134645 on 31st January 2011). The current application strives to address the appeal decision by virtue of proposed minimal rebuilding and a design treatment that sets out to echo the current design of what is an ancillary rural building. Whilst the latter is, to some extent, a matter of judgment, the design improvements over the dismissed appeal must satisfy the key AONB duties to conserve and enhance landscape and scenic beauty whilst also delivering C7 (a) (b) (d) and (g) which relate to, respectively, being harmonious with rural amenities, being in keeping with rural surroundings and not adversely affecting character in any designated area such as a nationally protected landscape. Criterion (g) requires justification of a loss to a business use, so that a residential use has</td>
</tr>
<tr>
<td>North Barn</td>
<td>SODC &amp; PINS</td>
<td>P18/S2451/FUL</td>
<td>Erection of a new detached single storey dwelling at</td>
<td>Pending</td>
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<tr>
<td>Chaucer Court Ewelme, Oxfordshire.</td>
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</table>

**CCB Comment**

Written Representations on behalf of the Chilterns Conservation Board.

The principal issue from an AONB standpoint must be the impact on the landscape character and the visual appreciation of the village settlement in the context of the nationally protected landscape. Great weight must be given to the conservation and enhancement of the landscape, as is required in Development Plan policy, the NPPF and in the AONB Management Plan. We place far less weight than the appellant does on the status of the Chilterns Buildings Design Guide (CBDG), which is a material consideration. The planning principle must be established before the design guide can be considered.

In this case the Chilterns Conservation Board’s view is that the landscape harm would significantly and demonstrably outweigh the benefits as set out in the appellant’s case (i.e. housing) and that this harm would materially erode the special qualities of this part of the AONB, both visually and when assessed against landscape character.

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<table>
<thead>
<tr>
<th>Owlpen School Lane Medmenham Bucks</th>
<th>WDC</th>
<th>19/06054/FUL</th>
<th>Demolition of existing dwelling and outbuildings and erection of replacement 3 bed</th>
<th>Pending</th>
</tr>
</thead>
</table>

**CCB Comment**

The design and access statement states that a ‘precedent’ is established for contemporary homes.
detached dwelling with associated bin store and landscaping works within the AONB and mentions the modernist house at Ipsden (SODC reference P10E/0716 28). No precedent is established and the Ipsden House is in a different location with a different topography and landscape character. CCB had objected to that application. However, the Chilterns Buildings Design Guide does accept design innovation.

CCB supports the point made by the Parish Council as to lighting impacts. The AONB is a dark skies location. The Institute of Lighting Professionals (ILP) guidance notes for the Reduction of Obtrusive Light (2011) at its page 4 on Environmental Zones places AONBs within the category of intrinsic dark skies. Lighting is a constituent part of tranquillity and this will be material when considering policies such as saved L1 in the consolidated Local Plan, paragraph 172 of the NPPF and section 85 on the Countryside and Rights of Way Act 2000. Policy L14 of the AONB Management Plan 2014-19 states that ‘Tranquillity should be conserved and restored when all development and major landscape management is planned’.

We appreciate that the elevations (as shown on 16/43/12B) denote fenestration within a recessed opening but we would seek a detailed level of control by means of planning condition to prevent light spill into the landscape. The nature of the approved glazing is very important and specialist guidance will need to be taken into account on matters such as laminated and tinted glazing. This protects the wider dark skies landscape and lessens impacts from nearby public paths which cross Millbank Wood. CCB recommends that these matters are discharged by condition but that some indicative content is discussed at application stage, to reassure on the matter of light spill.

| Springfield Road Industrial Estate | CDC | CH/2018/0240/DE | Application for reserved matters following outline planning permission | Granted 20 June 2019 | CCB Comment (based on AONB status of site and detail of design submission) and Objection raised to parking within the AONB. |
| Springfield Road Chesham | CH/2015/2020/OA for 55 dwellings with associated access, infrastructure and landscaping. CCB reference CH/2018/0240/DE | (1) CCB would want to be reassured that the AONB parcel of land is undeveloped and the landscape treatment here forms a naturalised boundary, with consideration given to the Bucks Landscape Character Assessment (2011) by Land Use Consultants. The AONB boundary is within the Ashley Green Settled Plateau (Bucks landscape character type 16.5) which exhibits a landscape of acknowledged *uniform land cover and land use creates a simple landscape, with a rural and peaceful character*. We append a plan showing the boundary line.  
(2) That the design detail of the elevations reflects some of the treatment as found within the Chilterns Buildings Design Guide. In particular this should cover materials, roof design and form, where the development faces outwards to the AONB and is within its setting. We say this because whilst we can see in the papers that there has been much design led discussions between the Local Planning Authority and the applicant. The drawings in the consultation portal do not show very much detail on the treatment of elevations and materials as proposed. With regard to the current round of consultation we would propose that the LPA seek greater reassurances here that the Chilterns Building Design Guide has been considered in the treatment of the development to the north eastern corner of the site as it faces the AONB. The applicant may wish to comment on that.  
  
Development facing outwards to the boundary here should be two storeys and reflect design principles in the Chilterns Buildings Design Guide. CCB appreciates that some of the former industrial buildings have been removed here, so that a residential replacement offers potential enhancement to the boundary. To ensure that this enhancement endures in the long term we promote a naturalised landscape buffer within |
| The Springs Golf Club, North Stoke, Wallingford, Oxfordshire, OX10 6BE, including demolition of the former Hotel, Staff Accommodation Block, Storage Shed, Committee Building, Stores 1 & 2 and Greenkeepers Shed, Maintenance Building and removal of Caravan. at The Springs Golf Club Wallingford Road North Stoke OX10 6BE | SODC | P19/S1536/FL | Pending | CCB Objection

CCB objects to this application on the principal grounds that it represents major development in the AONB without any exceptional justification and the design approach is harmful to the landscape character of the River Thames Landscape Corridor (LCA4) by promoting a linear spread of development that does not reflect any guidance in the Chilterns Buildings Design Guide.

The applicants argue that this proposal is not major development and this cannot be the case in view of the magnitude of what is proposed and the sensitivity of a highly valued and nationally protected landscape. Looking at the legal and policy tests that apply (as below) CCB cannot see how the new configuration of the site and the addition of 43 holiday lodges can conserve and enhance the AONB. The reverse applies and the spread of development is harmful. When balancing the landscape harm against the benefits of tourism and related employment we have concluded that the harm by far outweighs the benefits.

| Woodside Farm Chivery Aston Clinton Bucks AVDC | AVDC | 19/01107/AP | Pending | CCB Comments

The application is within a sensitive location within the AONB and is, to some degree, nested within the existing complex of farm buildings.

As the applicant correctly asserts in their supporting planning statement (at its paragraph 5.4) the National Planning Policy Framework resists isolated homes in the countryside unless special circumstances exist. That duty is combined with high level tests in policy and legislation to protect this highly valued nationally protected landscape.
Consequentially the proposal must be modest in scale and the subject of appropriate landscaping to assist in assimilating it to its context and to ensure that the impact upon the nearby Ridgeway national trail is minimal.

<table>
<thead>
<tr>
<th>Little Sparrows, Sonning Common</th>
<th>SODC</th>
<th>P19/S1476/P EJ</th>
<th>Pre-Application Consultation by Inspired Villages Group Ltd for a Continuing Care Retirement Community (Class C2).</th>
<th>Pre-app</th>
<th>CCB Pre-application comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>In summary, we do not consider that this application delivers on the protection, conservation or enhancement of those special qualities. We identify these qualities within the prevailing landscape character of semi enclosed and wooded dipslope that envelopes and surrounds Sonning Common. This land is a contiguous part of this landscape and to develop it this way would be harmful to its special qualities by eroding this part of the dipslope. Very little (if any) weight can be given to the applicant’s submission that the design would be compliant with the Chilterns Buildings Design Guide (CBDG) because the principle of development is not accepted. That principle is based on an assessment of landscape character and visual impact, itself derived from guidance in the GLVIA 3rd edition, produced by the Landscape Institute, and with reference to the site’s location within the semi enclosed and wooden dipslope that surrounds the settlement of Sonning Common. The site here exhibits gently sloping ground with a strong woodland backdrop and containment redolent of the wider landscape type. Recommendations The Chilterns Conservation Board’s view is that the landscape character and visual harm here would significantly and demonstrably outweigh the benefits, as set out in the applicant’s supporting planning papers, and that this harm would significantly erode the special qualities of this part of the AONB.</td>
<td>11.6.19</td>
<td></td>
</tr>
</tbody>
</table>
This proposal, if submitted, as a planning application, would run counter to the duties and protections contained in the CROW Act and NPPF 172 (whose exceptional development test is not satisfied) and also the Core Strategy, AONB Management Plan and Neighbourhood Plan. This proposal is positively harmful to these special qualities by the introduction of an excessive volume of built development within undeveloped land within the AONB.

CCB recommends that this application does not progress. The proposal would represent a visually intrusive form of development in the Area of Outstanding Natural Beauty that would fail to protect and enhance this highly valued, nationally protected, landscape.

No exceptional circumstances have been presented which demonstrate that the development is in the public interest, whereas great weight must be given to conserving the landscape and scenic beauty of the area.
## Current Live CCB Planning Application Casework

<table>
<thead>
<tr>
<th>Location</th>
<th>LPA</th>
<th>Ref number</th>
<th>Development</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benson Lane, Crowmarsh Gifford, OX10 8ED</td>
<td>SODC</td>
<td>P18/S4138/RM</td>
<td>Amended plans - 150 dwellings</td>
<td>9.7.19</td>
</tr>
<tr>
<td>Land to West of Houghton Regis, Watling Street, Houghton Regis</td>
<td>CBC</td>
<td>CB/19/00883/RM</td>
<td>Reserved matters of appearance, scale and landscaping for residential development of 255 dwellings following outline CB/15/0297/OUT</td>
<td>10.7.19</td>
</tr>
<tr>
<td>Land of Cuxham Road, Watlington</td>
<td>SODC</td>
<td>P19/S1928/O</td>
<td>Outline for up to 70 homes with associated open space and SUDS</td>
<td>12.7.19</td>
</tr>
<tr>
<td>Berry Hill Farm, Cobbler Hill, Wendover, Bucks, HP22 6QD</td>
<td>AVDC</td>
<td>19/02319/APP</td>
<td>Laying of hardcore surface (retroactive)</td>
<td>15.7.19</td>
</tr>
<tr>
<td>Land north side of lane leading to Cholsey Grange, Ibstone Road, Ibstone, Bucks, HP14 3XT</td>
<td>WDC</td>
<td>18/07602/FUL and APP/K0425/W/19/3 226658 (now at appeal by written reps)</td>
<td>Erection of a terrace of 3 x 2 storey 3-bed dwellings with one attached single garage and 1 x 2 storey 3-bed detached dwelling with integral garage, landscaping and creation of new access</td>
<td>31.8.19</td>
</tr>
</tbody>
</table>
Item 11  Development Plans Responses  

Author: Lucy Murfett Planning Officer  

Lead Organisations: Chilterns Conservation Board  

Resources: Staff time  

Summary: Since the papers for the last Planning Committee papers in March 2019 representations have been submitted on 16 consultations of which 4 were local plans, 2 neighbourhood plans, 3 county level strategic plans, 1 local list (planning application validation requirements), 5 airport expansion consultations and 1 road proposals consultation.

Purpose of report: To inform the Committee about, and seek approval of, the responses that have been made under delegated powers in connection with the consultations on development plan documents and other documents.

Recommendation  
1. That the Committee approves the responses sent in Appendix 5, notes the current consultations on development plans listed in Appendix 6 and provides comments to the Planning Officer as appropriate.
CCB Responses on Development Plan Consultations:

<table>
<thead>
<tr>
<th>Consultation document</th>
<th>Consulted by</th>
<th>Response – summary</th>
<th>CCB response date</th>
</tr>
</thead>
</table>
| Heathrow Airspace and Future Operations consultation | Heathrow Airport | 1. Managing noise for an expanded Heathrow  
Q1b. Please provide any comments you have on our proposals for a noise objective:  
The Chilterns Conservation Board welcomes the proposal to limit and, where possible, reduce the effects of noise, but we suggest this objective is expanded to include reducing the effects of noise on the natural environment, as well as on health and quality of life. We welcome the scope for modern satellite navigation, steeper climb profiles and quieter aircraft to improve the current situation. In particular, we look forward to the end of stacking above the Chilterns Area of Outstanding Natural Beauty (the Bovingdon stack). When implementing the noise objective, it is important to avoid overflight of Areas of Outstanding Natural Beauty (AONB). Tranquil valleys are one of the identified special qualities of the Chilterns AONB identified in the statutory Chilterns AONB Management Plan. The proposals should minimise over-flying of the Chilterns Area of Outstanding Natural Beauty and keep it tranquil. This will allow local communities have a place of outstanding beauty and tranquillity to get away from airport effects. People experience aircraft noise the most when they are outdoors. Peaceful leisure time should be recognised as important; the consideration is not only noise over where people live, but where they recreate. Over 10 million people live within an hour’s travel of the Chilterns AONB, and over 55 million leisure visits are made to and within the Chilterns AONB every year. The opportunity should be taken to re-prioritise the AONB and re-organise airspace to reduce overflying. For example Luton airport flights are currently held down at lower altitudes over the Chilterns AONB to allow stacking for Heathrow and other overflights. Airspace change must address this and bring better protection the Chilterns AONB as a strategic greenspace resource and one of the nation’s finest landscapes. The ultimate decision makers, the DIT and CAA, are subject to a statutory duty under section 85 of the Countryside and Rights of Way Act 2000 to have regard to conserving and enhancing the AONB when making decisions, and this is set out in CAP1616 at B77.  

Q1c Please provide any other comments or suggestions you have on our proposed approach to developing a package of noise measures for an expanded Heathrow.  
Baseline monitoring should take place now so that current and proposed noise levels in locations throughout the Chilterns AONB can be fully assessed. Qualitative assessment of tranquillity impacts for the AONB should also be undertaken as part of the options appraisal via WebTAG under ‘Landscape’. A project to research the number of visitors to different key locations in the Chilterns AONB would help identify key visitor destinations to avoid overflying, and understand when they are most visited. This could help ensure that decisions are evidence based to protect the most iconic places, eg visitor hotspots such as the beautiful Chilterns village of Turville. | 4.3.19 |
Q2c. Respite through runway and airspace alternation
The proposals should take account of where people visit for leisure time and when people are more likely to be outdoors in the Chilterns Area of Outstanding Natural Beauty (AONB). The highest numbers of visitors to the Chilterns AONB are found at weekends and holiday periods, so respite at those times would benefit more people enjoying outdoor activities. It would be helpful to map areas for existing ambient noise levels and ensure that quiet areas of protected countryside remain as quiet as possible, recognising their importance for quiet recreation, health and wellbeing. We note that CAP1616 guidance requires that specific attention is given to tranquility of AONBs.

Q3e. Please provide any other comments or suggestions you have on directional preference
Great weight should be given to minimising over-flying of the Chilterns Area of Outstanding Natural Beauty, this should influence the directional preference. Westerly departures from the new northern runway are likely to have the most impact on the Chilterns AONB, so an airspace design which minimises these would be a positive step, demonstrating regard to conserving and enhancing the natural beauty of the Chilterns AONB.

Q5b. Please provide any other comments you have on night flights and restrictions.
We support the ongoing night time curfew on flights.

Q6. To answer this question, please look at the design envelopes for expansion online using the postcode checker or look at them in our document Heathrow’s airspace design principles for expansion. What sites or local factors should we be aware of in your area (or other area of interest to you), when designing flight paths for an expanded three-runway Heathrow?
Please give enough information (e.g. postcode, address or place name) for us to identify the site(s) or local factor(s) you are referring to and tell us why you think it is important:

Great weight should be given to minimising over-flying of the Chilterns Area of Outstanding Natural Beauty (AONB). It is much more important to keep tranquil rural areas in nationally protected landscapes quiet than it is to reduce noise in urban areas which already experience high levels of background noise from traffic and aircraft so that airspace changes are less noticeable.

The Chilterns Conservation Board raises concerns that arrivals A7 and D8, and departures D5, D6 and D10, all involve overflying the Chilterns AONB. In the case of D6 this involves up to 17 flights an hour flying at heights of between 3000 and 4000ft over the AONB. The Chilterns Hills AONB is a high chalk ridge, so taking account of actual ground levels is important. Visitors and residents on the top of the Chiltern Hills at 850ft above sea level will experience aircraft passing lower than those on the river flood plain.

Westerly departures from the new northern runway (D6) are likely to have the most impact on the Chilterns AONB. It would help minimise impacts on the Chilterns AONB if the northern runway was used predominately for westerly arrivals. Alternatively if
westerly departures on the northern runway were restricted to the quietest and most low emissions aircraft, this could make a positive contribution to conserving and enhancing the tranquillity and air quality of the Chilterns AONB. This measure might incentivise operators to invest in their fleet.

The opportunity should be taken to re-prioritise the AONB and re-organise airspace to reduce overflying of the AONB. Great weight should be given to avoiding airspace changes which would generate noise and harm to the tranquillity of one of the country's finest landscapes and a nationally important visitor destination. As explained in CAP1616, the DfT and CAA are subject to a statutory duty under section 85 of the Countryside and Rights of Way 2000 to have regard to conserving and enhancing the AONB when making decisions: "(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

Baseline measurements and research are needed to identify the most sensitive parts of the Chilterns AONB for this project. These are likely to be tranquil valleys, since these are identified as part of the special qualities of the Chilterns AONB, especially where these are popular visitor destinations eg the village of Turville, the Hambledon Valley, the Stonor valley. Also the hills and Thames riverside around Henley-on-Thames. Within the AONB, the National Trails, Open Access land, nature reserves and National Trust land should also be mapped and given particular protection. Air pollution and effects on sensitive habitats and protected sites of national and international importance must be carefully addressed through Environmental Impact Assessment, and potentially, a Habitat Regulations Assessment. All three of the Special Areas of Conservation in the Chilterns AONB (Chilterns Beechwoods Special Area of Conservation, the Aston Rowant Special Area of Conservation and Hartslock Wood Special Area of Conservation) have already breached their critical loads for air pollution. For example, see http://publications.naturalengland.org.uk/publication/4808896162037760  Natural England, Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018:

"The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it. Cumulative effects with other growth projects eg local plan housing proposals and Luton airport expansion will need to be undertaken to ensure that these sites are protected.

Q7. To answer this question, please look at the design envelopes for Independent Parallel Approaches (IPA) online using the postcode checker or look at them in our document Making better use of our existing runways.
What sites or local factors should we be aware of in your area (or other area of interest to you), when designing new arrival flight paths to make better use of our existing two runways? Please give enough information (e.g. postcode, address or place name) for us to identify the site(s) or local factor(s) you are referring to and tell us why you think this local factor is important.

As above, great weight should be given to minimising over-flying of the Chilterns Area of Outstanding Natural Beauty (AONB) to protect its tranquillity and air quality. As explained in CAP1616, the DfT and CAA are subject to a statutory duty under section 85 of the Countryside and Rights of Way 2000 to have regard to conserving and enhancing the AONB when making decisions affecting the AONB. Since IPA would retain the Bovingdon stack, presumably with more aircraft using it, this could as worsening of the situation, detrimental to the tranquillity and air quality of the Chilterns AONB.

Q8. Having considered everything within the consultation, do you have any other comments?

In brief, the Chilterns Conservation Board’s main concerns regarding Heathrow airspace and future operations are:

- noise and effects on tranquillity from overflying the Chilterns AONB
- air pollution and effects on sensitive habitats in the Chilterns including protected sites of national and international importance. These include the Chilterns Beechwoods Special Area of Conservation, the Aston Rowant Special Area of Conservation, Hartslock Wood Special Area of Conservation and many Sites of Special Scientific Interest in the Chilterns AONB. All three of the Special Areas of Conservation in the Chilterns AONB have already breached the critical loads for air pollution. For example, see http://publications.naturalengland.org.uk/publication/4808896162037760 Natural England, Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018: “The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.
- cumulative impacts from the combined changes in flightpaths from Luton and Heathrow - it is important that in any redesign of flightpaths there is careful design to avoid harm to the tranquillity of the AONB, and take all opportunities to reduce noise over the AONB (eg remove the Bovingdon stack)
- people walking, cycling, riding or volunteering in the AONB are likely to be outdoors and expecting to enjoy an experience of ‘getting away from it all’ so are especially noise sensitive.

The Chilterns Conservation Board could also assist with identifying opportunities for AONB mitigation and enhancement.
<table>
<thead>
<tr>
<th>Q9. Please give us your feedback on this consultation (such as the documents, website or events)</th>
<th>There is not enough information on existing flightpaths to make a comparison with what is proposed. The broad bands of numbers of flights per hour at different altitudes also makes it difficult to understand the level of impact (eg “0-47 Flights per hour”).</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>The project should be assessed against whether it achieves Environmental Net Gain, in the light of the Government’s 25 Year Environment Plan and the Draft Environmental (Principles and Governance) Bill.</td>
</tr>
<tr>
<td>2.</td>
<td>Since this is an airport development, the lack of inclusion of aircraft emissions (including take-off and landing) from the scope of the primary assessment of air quality assessment seems surprising and questionable. Aircraft emissions are being separated off and relegated to a consideration as part of cumulative effects.</td>
</tr>
<tr>
<td>3.</td>
<td>Cumulative effects as set out in para 4.6.6 the initial list of ‘other development’ has been drawn too closely. It only proposes to look at other NSIPs, major developments schemes over 100 homes (when the definition in the NPPF for major housing is development where 10 or more homes will be provided or the site has an area of 0.5 hectares or more) in a selected list of nearby local authorities, and industrial and warehousing schemes within 5km. The scope should consider a wider area. This should include parts of the Chilterns AONB, where for example, increased traffic along the M40 and M25 which cut through the AONB could have an effect on air quality, noise and habitats. Other major projects like HS2 and the Ox-Cam expressway and growth corridor are all putting pressure on the Chilterns AONB and should be scoped into the assessment of cumulative effects.</td>
</tr>
<tr>
<td>4.</td>
<td>The Chilterns Beechwood Special Area of Conservation and the Aston Rowant Special Area of Conservation are both close to motorways and major roads likely to experience increased traffic from the expansion of Heathrow. Air pollution and effects on sensitive habitats and protected sites of national and international importance must be carefully addressed through Environmental Impact Assessment and Habitat Regulations Assessment. All SACs in the Chilterns AONB have already breached their critical loads for air pollution. For example, see <a href="http://publications.naturalengland.org.uk/publication/4808896162037760">http://publications.naturalengland.org.uk/publication/4808896162037760</a> from Natural England, Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018: “The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for...”</td>
</tr>
</tbody>
</table>
nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

5. The 5km proposed study area for landscape and visual considerations is too narrow. Might Heathrow be visible enough from the Chilterns Hills or locations considered to be in the setting of the Chilterns AONB?

6. Please ensure that night time views as well as daytime views are included in the Landscape and Visual Impacts Assessment in order to identify and address any increase in light pollution. This will help safeguard dark night skies and the experience bright stars from the Chilterns AONB.

7. Impacts on Chilterns chalk streams should be assessed, with careful scrutiny of where additional water supply for the Western Hub will come from. Chalk streams are an internationally rare habitat that are suffering from over-abstraction which is decreasing water levels in the streams and shortening their functional length.

The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of CRoW Act).

Going forward the Chilterns Conservation Board would like to be involved as stakeholders and consultees in the Heathrow work please, in order to advise on whether the plans conserve and enhance the Chilterns AONB, and to ensure that the EIA and HRA include consideration of the Chilterns AONB. For info, the Chilterns Conservation Board is the statutory independent corporate body for the Chilterns Area of Outstanding Natural Beauty, set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000. The Chilterns Conservation Board is a statutory consultee for National Policy Statement consultations, a prescribed consultee for major infrastructure projects that affect the Chilterns AONB and an interested party for examinations in connection with Nationally Significant Infrastructure Projects that may affect the Chilterns AONB (as set out in the Infrastructure Planning (National Policy Statement Consultation) Regulations (2009), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations (2009) and the Infrastructure Planning (Interested Parties) Regulations (2010).
The Chilterns Conservation Board would like to stay involved in the Heathrow Western Hub NSIP to ensure the following are fully addressed:

- noise and effects on tranquillity from overflying the Chilterns AONB
- air pollution and effects on sensitive habitats in the Chilterns including protected sites of national and international importance
- cumulative impacts from the combined changes in flightpaths from Luton and Heathrow - it is important that in any redesign of flightpaths there is careful design to avoid harm to the tranquillity of the AONB, and take all opportunities to reduce noise over the AONB (eg Bovingdon stack)
- people walking, cycling, riding or volunteering in the AONB are likely to be outdoors and seeking tranquillity, so are sensitive to noise disturbance and the sight of aircraft flying overhead.
- identifying opportunities for AONB mitigation and enhancement.

Para 3.16 should add reference to the “Chilterns AONB Management Plan”. The NPPG is clear that Local Plans should take into account AONB Management Plans, see NPPG Natural Environment para 004 Reference ID: 8-004-20140306.

Add to list: “Chilterns AONB Management Plan”

Policy 16 Landscape and Green Infrastructure
The Minerals Local Plan should contain a standalone policy on the Area of Outstanding Natural Beauty (AONB), or at the very least, it should have its own section in the landscape policy. Why is there a policy for the Green Belt but no policy for the nationally designated Chilterns AONB? There is not enough emphasis on this national designation. As it stands the policy fails to meet NPPF para 171 “Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework” and NPPF para 172. More weight should be given to the Chilterns AONB in the Minerals Local Plan. This would demonstrate HCC’s statutory duty under section 85 of the Countryside and Rights of Way Act 2000.

Add new policy on AONB. Suggest using the model policy for the AONB developed by the Chilterns Conservation Board in conjunction with the 13 local planning authorities across the Chilterns.

Policy 17 Biodiversity
Policy 17: Biodiversity is not safeguarding sites properly in line with the hierarchy of sites of importance for biodiversity. The wording regarding internationally designated sites (like SACs and SPAs, Ramsar Sites) and nationally designated sites (like SSSIs and NNRs) should be strengthened from “there are no irreversible or unacceptable impacts” to “there are no adverse effects” (to use Habitat Regulations Assessment terminology).

The Plan’s HRA states (at page 80) that Policy 17 “includes a specific requirement to avoid irreversible or unacceptable adverse impacts on National and International sites.” But it does not, the word adverse has been left out, the policy is too weak and could fail to safeguard the Chilterns Beechwoods SAC. ‘Irreversible’
should be deleted, even temporary or construction stage adverse impacts should not be permitted for sites of this calibre. Amend bullet point 4 to: “there are no adverse impacts on International, National and Local statutory nature conservation sites (e.g. Special Areas of Conservation, Special Protection Areas, Ramsar sites, National Nature Reserves, Sites of Special Scientific Interest)”

Appendix 2 - Policies Map
The Policies Map could usefully show the Chilterns AONB boundary. There is currently no constraints map provided to show for example the AONB, Green Belt, Habitats Sites.

<table>
<thead>
<tr>
<th>Oxfordshire 2050 SA Scoping Report</th>
<th>OCC Joint response with North Wessex Downs AONB</th>
</tr>
</thead>
</table>

**Introductory comments:**
25% of Oxfordshire is designated AONB, an area covering 668km² which together cover around the same land area as Exmoor National Park. The Cotswolds, Chilterns and North Wessex Downs AONBs are nationally protected as some of the finest areas of countryside in the UK. They have the same status in planning as National Parks, but are largely overlooked in the JSSP and SA Scoping Report. More weight should be given to Oxfordshire’s three AONBs, providing a positive policy framework for the conservation and enhancement. They are national assets that bring economic benefits and tourism as well as ecosystem services and health and wellbeing benefits. There needs to be a greater emphasis on enhancing the landscape and not simply conserving.

Topic Paper 6 recognises the weight of the AONB management plans as statutory documents and the legal duty of regard as per section 85 of the Countryside and Rights of Way Act 2000, this is however not clear in the Oxfordshire 2050 Plan.

Oxfordshire Plan 2050 – SA Scoping Report Consultation, March 2019

**Q1. Is the scope of the SA appropriate as set out considering the role of the Oxfordshire Plan 2050 (JSSP) to help meet and manage Oxfordshire’s growth needs and development ambition?**

The SA Scoping should be about assessing effects on environmental objectives, it should not be about meeting and managing development ambitions.

The Oxfordshire Plan 2050 SA objectives should contain clear objectives for net environmental gain and environmental enhancement. These should include cherishing and investing in the three AONBs as irreplaceable assets for the nation.

**Q2. Are there any additional plans, policies or programmes that are relevant to the SA policy context that should be included?**

Yes. Please add the AONB Management Plans for the 3 AONBs in Oxfordshire.

The NPPG is clear that Local Plans should take into account AONB Management Plans, see NPPG Natural Environment para 004 Reference ID: 8-004-20140306.
**Q3. Whether the existing and emerging baseline information provides a suitable baseline for the SA of the Oxfordshire JSSP?**

We challenge the conclusions reported in 3.122 from the 2016 LUC analysis of the environmental sensitivity of Oxfordshire’s environment to changes in land use:

“The large areas that relate to the three AONBs in the west (Cotswolds), south (North Wessex Downs) and south east (Chilterns) of the county are a significant feature. These large areas scored as moderate sensitivity due to their size, but tended to mask other areas of moderate and lower sensitivity within the AONBs, although it is unlikely to be appropriate to accommodate strategic scale development within them.”

This LUC sensitivity report has not been the subject of consultation. It does not recognise the weight given to AONBs as nationally protected landscape by the NPPF para 172, nor the statutory duty that councils are under to have regard to the purpose of conserving and enhancing the AONBs (Countryside and Rights of Way Act 2000, section 85). It is not appropriate to score AONB landscapes as only of moderate sensitivity because of their size, that does not have any kind of recognised policy grounding, nor is it based on good practice methodology.

**Q4. Are there are any additional SA issues relevant to the Oxfordshire Plan 2050 (JSSP) that should be included?**

Yes:
- loss biodiversity and bio-abundance across Oxfordshire
- dark skies and light pollution

**Q5. Is the SA Framework appropriate and does it include a suitable set of SA objectives and appraisal criteria for assessing the effects of the proposed Oxfordshire Plan 2050 (JSSP) and reasonable alternatives?**

In Table 5.1 the appraisal question for the AONB is wrong:

“Will the JSSP...Protect the character of Oxfordshire’s three AONBs (Cotswolds, Chilterns, North Wessex Downs) including their setting?”

If you protect their character you are not meeting the statutory duty in the Countryside and Rights of Way Act 2000 (section 85). This is a duty to natural beauty, not character. Suggest change to:

‘Conserve and enhance the natural beauty of Oxfordshire’s three AONBs (Cotswolds, Chilterns, North Wessex Downs) including their setting?’

Natural Beauty is more than character. The term ‘natural beauty’ is enshrined in the 1949 National Parks and Access to the Countryside Act. Over the year’s qualification and amendment to the legislation has made it clear that natural is not just the look of the landscape, but includes the landform and geology, the plants and animals, the landscape features and the rich history of human settlement over the centuries’. In 2006, the government clarified that land is not prevented from being treated as of natural beauty by the fact that it is used for agriculture, woodlands or as a park; or because its physiographical features are partly the product of human intervention in the landscape.

Section 4.2 identifies key sustainability issues that the JSSP will need to address and summarises these. We object to the order that these are listed in and the apparent priority this accord the issues, the first being:
| Oxfordshire 2050 Plan Consultation March 2019 | | | |
|-------------------------------------------|-------------------------------------------|
| Welcome the inclusion of natural environment within the primary vision but feel it is playing it safe with the use of valued and conserved, which gives the impression of ensuring it remains the same. The vision (especially at a time when climate change and health and wellbeing are key topics) should look to enhance and achieve net gains in biodiversity and landscape. | | | |
| Quality of Life Context | | | |
| Good that the plan recognises the role of the environment in people’s quality of life but that is not utilised fully in Draft objective 3, improving access to open countryside/green space should be a key thread through the Plan. | | | |
| Economic Context | | | |
| AONBs play a role in the economic context of the County particularly Tourism, this needs to be acknowledged, the topic paper Securing Natures Benefits is all about harnessing the environment for attracting investment in the County, but this is not integrated into the plan. | | | |
| Natural and Built Environment Context | | | |
| In paragraphs 13 and 14 AONBs are referenced but it does not recognise the 3 AONBs status as nationally protected landscapes. This could be included in para 13 not 14 as the conservation of historic environments is a separate matter (AONBs purpose is to conserve and enhance as the historic environment has a greater emphasis on protection and preservation. In para 15 one of the major challenges faced by the 3 AONBs is poorly designed and sited development, development is also a pressure faced within Oxfordshire Green Belt and yet it is not included. Major challenges faced by natural environment needs to be reassessed. Development does not have to be a negative element, but the standard of the development needs to be raised significantly. | | | |
| Transport and Connectivity Context | | | |

Do you have any further comments you would like to add? Oxfordshire needs a Green Infrastructure Strategy.
Alleviating pressure on the A34 as a result of the Ox-cam expressway will not be a straightforward one as a large stretch passes through the North Wessex Downs AONB, this needs to be a primary consideration in any future project. Where does Green Infrastructure fit in?

**Aspirations**

Happy to see the Environment as the first aspiration, but the aim should be to enhance and not protect as that suggests retaining the environment as it is, rather than taking the opportunities available to improve connections and enhance landscape character and biodiversity.

**Aspiration 1: Protect Environmental Quality**

Draft 1 and 2 appear similar, could they take a risk and be a little more specific or possibly include an objective for natural environment in general and another for improved green open spaces within Towns/villages/developments as these spaces are not given enough thought.

Objectives should be to conserve and enhance (primary purposes of AONBs). Net gain should relate to both landscape and biodiversity as they work together in creating the valued landscapes within and beyond the County.

**Aspiration 2: Strong and Healthy Communities**

Draft Objective 3 – include improving access into countryside/natural environment.

**Aspiration 4: Improve housing availability and affordability**

Draft Objective 7 – Housing should be based on need, particular emphasis on affordable housing to meet local need. Concerned that housing should simply be economic led. The Inspectors rejection of Harwell Campus Innovation Village is testament to that. Capacity is also an issue, Didcot is struggling to cope with its growth in terms of providing services and facilities to meet local need and infrastructure and the character of villages within AONBs is being harmed.

**Discussion point 4**

Dispersal of future developments/allocations would not be supported by the AONB units as it is likely to result on greater pressure on the protected landscape and the setting of these. A number of villages/towns within the protected landscape have accommodated significant growth which has adversely affect the townscape and the wider landscape character type. Poor design, high densities and poor use of materials are common issues which would not be resolved by adopting a dispersal method. New settlements can take a long time to be delivered, but this plan needs to think beyond 2050 as the environments it creates will exist beyond 2050. The Plan needs to think of itself as delivering a legacy that residents/workers and visitors can be proud of. Masterplans for new settlements would provide the opportunity to create a landscape led approach in designing new spaces/places to live work and play. Wheel Cluster is already evident, as neighbouring authorities are having to accommodate the unmet need of Oxford City which is having a knock-on effect to settlements within the AONBs.

**Discussion point 5**

More emphasis is needed on green infrastructure and interconnectivity between natural and built environment. Use of the
<table>
<thead>
<tr>
<th>Thames Path for commuters, it is a well-used space by local residents and visitors for leisure purposes but has good links between settlements which could be enhanced. The Thames Path is in need of repairs and potential upgrading of some surfaces which could see it used as a shared space for pedestrians and cyclists. The same could be said for the Oxford Canal.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMM63 POLICY DM30 – THE CHILTERNs AREA OF OUTSTANDING NATURAL BEAUTY</td>
</tr>
<tr>
<td>The Chilterns Conservation Board and Wycombe DC discussed the wording on DM30 and sadly were unable to reach agreement. We have asked WDC to submit the correspondence to the examination, so trust that you have this, if not we would be happy to supply to the Programme Officer.</td>
</tr>
<tr>
<td>Wycombe contains a large part of the Chilterns AONB. We are not consulted on most proposals in the AONB (only larger schemes), so this DM policy in the Wycombe Local Plan will be of great importance to determining thousands of planning applications large and small over the plan period. The policy is both weaker than the existing Wycombe policy CS17 and the NPPF.</td>
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<tr>
<td>The main mods are far from our recommended wording. For the policy DM30 itself none of our representations made to the examination have been addressed. The policy is in fact now worse. The proposed modification to part 2 of the policy is no improvement and it is now further from the NPPF. It is weaker than before because of the deletion of ‘exceptional circumstances’. The wording in the NPPF is negatively worded (‘should be refused’), not positively worded as in DM30 (‘will only be permitted in accordance with national policy, and will otherwise be refused.’)</td>
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<td>There is no justification for keeping ‘conserve, and where possible, enhance’ in DM30. ‘Where possible’ is not consistent with NPPF para 172, nor with the Countryside and Rights of Way Act 2000 section 85 which sets a duty to have regard to the purpose of conserving and enhancing the natural beauty of AONBs. Both say “conserve and enhance”, not “conserve and where possible enhance”. This is not a matter of which version of the NPPF you use, this is nothing new, the CRoW Act established ‘conserve and enhance’ as the statutory duty in the year 2000. The main mods to para 6.100 correctly add ‘and enhancing’ to reflect the revised NPPF, this should be followed through in the DM30 policy text.</td>
</tr>
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<td>The policy starts with the words ‘The Council will require…’ which does not recognise other potential decision makers (eg PINS) and should be changed as other main mods have done with other policies. <strong>The caveat “and where possible” should be deleted.</strong></td>
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<tr>
<td>The proposed modifications to the supporting text are better in some places. We support:</td>
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<tr>
<td>• the addition of ‘and enhancing’ in 6.100. This has been updated to reflect the new NPPF.</td>
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<tr>
<td>• The cross-references to CP10 in 6.101</td>
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</tbody>
</table>
However we object to:

- Para 6.100 which as amended is incorrect, the revised NPPF states ‘which have the highest status of protection in relation to landscape and scenic beauty these issues’.
- The revised NPPF does not advise that ‘due regard is had to the economic and social well-being of all rural communities’. This should be corrected.
- The additions at the end of para 6.101 are confusing and equivocal because of the ‘where possible’ caveat and ‘The Council recognises that not all development can enhance natural beauty’.
- The claim in para 6.102 that section of Policy DM30 ‘replicates the NPPF’, it does not, nor does it make it clearer.
- The additions to para 6.103 that “Where development in the setting of the AONB would demonstrably harm the AONB, and having regard to the scale of harm and the significance of the landscape, consent will be refused unless this harm is outweighed by other land use planning benefits.” This wording has not been discussed with us and conveys the message that the Council plans to allow development in the setting that causes demonstrable harm to the AONB if and when it suits.

The additions identified above to paras 6.101-103 should be deleted.

The Chilterns Conservation Board proposes the following wording to improve DM30, by making it more complaint with the NPPF and reflecting the joint work done with Wycombe DC and the other AONBs covering the Chilterns in a model policy:

**Policy DM30 The Chilterns Area of Outstanding Natural Beauty**

1. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it:
   a) conserves and enhances the Chilterns AONB’s special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation;
   b) is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment;
   c) meets the aims of the statutory Chilterns AONB Management Plan, making practical and financial contributions towards management plan delivery as appropriate;
   d) delivers the highest quality design as set out in the Chilterns Building Design Guide and technical notes, respecting the natural beauty of the Chilterns, its traditional built character and reinforcing the sense of place and local character; and
   e) avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.

2. Permission for major developments in the Chilterns Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy.
PMM5 POLICY CP3 – SETTLEMENT STRATEGY
The Chilterns Conservation Board agrees with the change to para 4.22 which adds reference to the AONB and other constraints to explain the settlement strategy, but this should go in the policy text of Policy CP3 itself, as agreed at the examination.

PMM6 POLICY CP4 – DELIVERING HOMES
The Chilterns Conservation Board notes the updates to Table 4 which show that greater supply has been achieved to March 2018 than anticipated. This is a significant number of between 732 – 972 more dwellings than expected. Completions will have included windfall development in the AONB, providing a contribution to housing supply in a way that the AONB can successfully accommodate if DM policies are carefully worded and applied. The Plan itself at para 4.40 still states that “a housing capacity of 10,925 was identified for within the plan period to 2033. Development above this level would cause significant and demonstrable harm or be contrary to specific national policies that restrict development”. The number now being proposed is 11,659 – 11,899 homes, which is between 732 – 972 more homes than the number the plan itself identifies would cause significant and demonstrable harm or be contrary to national policy. As a result, the greenfield allocations in the AONB are no longer required and cannot be justified. The most harmful greenfield allocations in the AONB should be deleted, in particular HW9 Glynswood and RUR1 Land South of Finings Road.

PMM9 POLICY CP10 – GREEN INFRASTRUCTURE AND THE NATURAL ENVIRONMENT
The Chilterns Conservation Board supports these changes which refer to the NEP and latest good practice to protect, enhance, expand, connect, improve and use the existing green infrastructure.

PMM17 Policy HW9 – Part of Greens Farm, Glynswood, Green Hill, High Wycombe
The Chilterns Conservation Board objects that the main modifications do not go far enough to address the harm of this allocation. The modifications do not give great weight to the AONB (NPPF para 172) or show regard to conserving and enhancing the natural beauty of the AONB as required by statute in the Countryside and Rights of Way Act 2000 section 85. This is major development is the AONB, because of the scale of development and the sensitivity of the site. The allocation is not sound, because it is not consistent with national policy. The increased dwelling supply in PMM6 mean this site is no longer needed. No exceptional circumstances case can be made under para 172 of the NPPF. Developing this site would be positively harmful to the Chilterns AONB, in particular its ecology, landscape character, views, and the heritage of the adjacent Hughenden Manor and Park, owned by the National Trust. The Glynswood site is entirely within Priority Habitat as identified on DEFRA’s authoritative mapping database.
https://magic.defra.gov.uk/MagicMap.aspx. This shows this site is on the Priority Habitat Inventory as ‘no main habitat but additional habitats exist: G04: Lowland calcareous grassland’. This is chalk grassland, and it should be better managed and restored to its full glory as chalk grassland. We now have a larger area of golf courses in the Chilterns AONB than we have chalk grassland, and to set this in context, the Chilterns is nationally important for chalk grassland. We need chalk grassland more than 50 dwellings, especially given the updates to the housing numbers in PMM6. Wycombe District Council, because of a problem with their GIS priority habitats data coming from the Bucks and Milton Keynes Environmental Records Office which does not match the DEFRA magic maps dataset, were not I believe aware of the Priority Habitats status of this site at the time of proposed allocation.

Neither Policy HW9 nor the lower case text refer to ecology or the status of this site as Priority Habitat. How can this be sound or acceptable? Priority Habitats should be conserved, restored and enhanced (NPPF para 174), not developed. Priority Habitats are Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

This is an area of chalk grassland in a dry chalk valley with a mosaic of priority habitats and ancient woodland nearby. It is a valuable part of a network of GI to which the Policy CP10 (as improved by PMM9) apply. There is an inconsistency between HW9 and Policy CP10 which commits to: “Conserving, protecting and enhancing the Chilterns Area of Outstanding Natural Beauty and other natural environmental assets of local, national and international importance by: a) Protecting them from harmful development through development management policies in this Plan and the Delivery and Site Allocations Plan including the protection of biodiversity and landscape designations and landscape character based approach to considering proposals;”

Please see overleaf for an extract from magicmaps showing the priority habitat on this site.

**Given this information the allocation of HW9 should not go ahead.**

**Recommendation: Delete allocation HW9 as ecological information on Priority Habitats now indicates that it is not suitable for development.**

PMM23 POLICY HW21 – LAND AT QUEENSWAY, HAZLEMERE

The Chilterns Conservation Board objects to the use of “where possible” in the new bullet point: “Conserve, and where possible enhance, the natural beauty of the AONB”

This is not consistent with the NPPF para 172, nor with the Countryside and Rights of Way Act 2000 section 85 which sets a duty to have regard to the purpose of conserving and enhancing the natural beauty of AONBs. Both say “conserve and enhance”, not “conserve and where possible enhance”. This is not a matter of which version of the NPPF you use, this is nothing new, the CRoW Act established ‘conserve and enhance’ as the statutory duty in the year 2000,

**The caveat “where possible” should be deleted.**

PMM33 POLICY PR8 – PROVISION AND SAFEGUARDING OF TRANSPORT INFRASTRUCTURE
The Chilterns Conservation Board agrees with the addition of “A safe crossing of the relief road for non-motorised users between the east and west parts of Picts Lane” but this should go in the policy text as well as the new bullet point in para 5.3.140 of the lower case text.

This is in the Chilterns AONB and this area is an important gateway to the Chilterns for walkers, horseriders and cyclists. As well as the local community (larger in number with the expansion area), this includes visitors using the train to access the Ridgeway National Trail and enjoy the Chilterns, which are the kinds of sustainable recreation that should be encouraged and supported.

PMM36 POLICY PR11 – LAND TO THE REAR OF POPPY ROAD

The replacement wording on responding sensitively to the environmental context of the site simply demonstrates the poor suitability of the site for housing development. The site is partly within the Chilterns AONB and is visible from important viewpoints in the Chilterns AONB and the Ridgeway National Trail.

A housing development here of 58 dwellings will not conserve and enhance the Chilterns AONB. This allocation fails to give great weight to conserving and enhancing the natural beauty of the AONB as required by para 115 of NPPF (now 172). The ecology of the site and its surroundings, in particular the Pyrtle Brook, a Chalk Headwater Priority Habitat, which emerges from the foot of the chalk escarpment at the nearby Pyrtle Spring, requires further research. It not justified to include an allocation and park the issue of its ecological value until the planning application stage, as the policy with its modifications does. The ecological, hydrological and visual impact assessments should be done before contemplating allocation of such a site. The allocation should be deleted, it is not justified and has an inadequate evidence base to support it.

Furthermore, there is an inconsistency as proposed between PR11 with requirements for ecological, hydrological and visual impact assessments, buffers and mitigation measures, and the other ecologically valuable greenfield sites proposed for allocation in the AONB and its setting, which are equally or more worthy of these added words.

The Chilterns Conservation Board objects to the new wording proposed to para 5.3.161 “Due to its limited size and location within the urban setting of Princes Risborough, it is not considered that development here would amount to major development within the AONB, in the terms of National Policy for the AONB”. Size and location are only a small part of how to test for major development in the AONB. The advice in the new footnote 55 of the NPPF 2019 is:

“55. For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

The purposes for which the AONB has been designated are the purpose of conserving and enhancing natural beauty. Chalk streams are one the special qualities of the Chilterns AONB, it was designated in particular to protect these special qualities.

PMM40 POLICY PR15 – MOLINS SPORTS GROUND
The Chilterns Conservation Board questions the additional wording: “4. Local sources of flood risk should be managed”. Why? This is allocated for recreation. Is there a harm from ephemeral groundwater or surface water flooding here? The site’s geography is at the base of the escarpment where chalk springs emerge as a normal and natural feature. The application of this phrase to this particular policy should be reconsidered to ensure it is appropriate. Suspect it has been added to all allocations without testing whether necessary or desirable.

PMM41 POLICY PR16 — LAND AT PRINCES RISBOROUGH STATION

The Chilterns Conservation Board welcomes the additional wording on Prince Risborough station being a gateway to the Chilterns AONB, and the proposals for additional visitor facilities here. The re-opening in 2018 of the preserved railway, the Chinnor and Princes Risborough Railway, right into Princes Risborough station has already seen a 15% increase in their passengers. They have seen many new visitors coming on the train from London on foot or with bicycles to connect onto the steam/diesel train to Chinnor and then walk or cycle back to Princes Risborough Station along the Ridgeway or tackle the challenge of cycling back on the hilly route. The station is an important gateway to the Chilterns AONB and has great potential for sustainable recreation and the tourism economy.

PMM44 Table 20

The Chilterns Conservation Board objects that the main modification does not go far enough to address the harm of the allocation of RUR1 Land south of Finings Road, Lane End. The allocation should be deleted in its entirety. Just 10 dwellings on this site is so little gain in housing supply for such a large loss in ecology, landscape character, and to the local food economy, since this site is grazed by a tenant farmer who is one of our most cherished local food producers. It cannot be worth it, especially with the new figures showing a healthier housing supply in PMM6.

The modifications do not give great weight to the AONB (NPPF para 172) or show regard to conserving and enhancing the natural beauty of the AONB as required by statute in the Countryside and Rights of Way Act 2000 section 85.

PMM45 Policy RUR1 Land South of Finings Road, Lane End

The Chilterns Conservation Board objects to the allocation of this site and considers that the proposed main modification does not go far enough to address the harm of the allocation of RUR1 Land south of Finings Road, Lane End. The modifications do not give great weight to the AONB (NPPF para 172) or show regard to conserving and enhancing the natural beauty of the AONB as required by statute in the Countryside and Rights of Way Act 2000 section 85.

It will not be possible through “design and layout to limit its impact upon the Area of Outstanding Natural Beauty”. The site is within the AONB. A housing development of 10 dwellings here will not conserve and enhance the Chilterns AONB. This is attractive undulating rural pasture used for grazing cattle. In a sensitive location between ancient woodland and a Conservation Area and listed building, it is valuable in terms of natural and historic
environment as well as having a strong landscape character. Residential development bordering the wood is likely to increase disturbance to the wood, a 15 metre buffer would not safeguard this irreplaceable habitat. There is no defensible boundary to prevent pressure for future development of the rest of the field. Any improvements to the access onto Finings Lane and introduction of footways to the village would affect rural character. This field has been grazed for generations by a tenant farmer who is one of our most cherished local food producers. This is the dairy producer Lacey’s Farm, http://www.laceysfamilyfarm.co.uk/ and the proposed allocation is land on which the pedigree Guernsey herd graze. This business is one of the few remaining dairy livestock producers in the Chilterns AONB. It is exactly the kind of farm business undertaking conservation grazing and sustainable local food production that the Chilterns AONB Management Plan seeks to protect and encourage.

Just 10 dwellings on this site is so little gain in housing supply for such a large loss in ecology, AONB landscape character, and to the local food economy. It cannot be worth it, especially with the new figures showing a healthier housing supply in PMM6.

Finally, the site has an access problem. The access shown in Figure 41 is across Registered Common Land. Works to common land would require the completion of a separate legal process under Section 38 of the Commons Act 2006. This requires common land consent for restricted works from the Planning Inspectorate on behalf of the Secretary of State for Environment, Food and Rural Affairs. Details on the process here https://www.gov.uk/guidance/carrying-out-works-on-common-land. Applications are determined against criteria set out in Section 39 of the Act including nature conservation and the conservation of the landscape. The Chilterns Conservation Board would be consulted by PINS on the application and would recommend against creation of a residential access here. Since there is no certainty that consent would be forthcoming, this site is undeliverable. This information should be before the examination, but neither the policy text nor the supporting text refer to the constraint of the Registered Common Land. Given this information the allocation of RUR1 should not go ahead.

Recommendation: Delete allocation RUR1 as information on Registered Common Land now indicates that it is not deliverable for development.

PMM46 POLICY RUR2 – LAND BETWEEN CHALKY FIELD AND MARLOW ROAD, LANE END
The Chilterns Conservation Board objects to the allocation of this site and considers that the proposed main modification does not go far enough to address the harm of the allocation of RUR2 Land Between Chalky Field and Marlow Road, Lane End.

It will not be possible through “design and layout to limit its impact upon the Area of Outstanding Natural Beauty”. The site is within the AONB.

A housing development here of 27 dwellings will not conserve and enhance the Chilterns AONB. Development would neither conserve nor enhance this attractive gently sloping pastureland in use for sheep grazing. It would represent urban encroachment beyond the south eastern edge of Lane End. The lack of a defensible boundary
could lead to pressure in time to develop whole field to Lower Court Farm.
The modifications do not give great weight to the AONB (NPPF para 172) or show regard to conserving and enhancing the natural beauty of the AONB as required by statute in the Countryside and Rights of Way Act 2000 section 85. The allocation should be deleted in its entirety.

PMM50 POLICY RUR7 – LAND OFF CLAPPINS LANE, NAPHILL
The Chilterns Conservation Board considers that the proposed main modification does not go far enough to address the harm of the allocation of RUR7 Land off Clappins Lane, Naphill. This site is in the Chilterns AONB. The number of homes at 64 dwellings too large and is likely to constitute major development in the AONB. The Chilterns Conservation Board considers that the site may be appropriate as a smaller development, delivered as a Rural Exceptions Site as was once proposed. The Chilterns Beechwoods Special Area of Conservation (SAC a European level biodiversity designations) is close by to the west of Naphill and Walters Ash. Aerial photography reveals the role of the hedgerows of this RUR7 site in providing part of a green corridor between the ancient woodlands of Naphill Common to the west and Little Stocking Wood to the east. Recommended changes to RUR7:
• Reduce the housing number to allow criterion 5 of the policy to be effective (a green infrastructure link between the woodlands).
• Clarify criterion 2 as follows: “2. Provide road access off Clappins Lane and provide additional suitable footways towards the village centre, while retaining the oak tree;”

PMM53 POLICY RUR10 – LAND TO THE REAR OF STOKENCHURCH BUSINESS PARK, IBSTONE ROAD, STOKENCHURCH
The Chilterns Conservation Board objects to the widening of uses permissible to include sui generis employment generating uses at this Stokenchurch site. In our previous representations we explained why this greenfield location within the Chilterns AONB, near a Special Area of Conservation, is not suitable for B8 storage and distribution uses. It would involve tall sheds, large areas of hardstanding, external lighting, and generate lorry trips through the nearby Aston Rowant SAC which is already in exceedance for air pollution from nitrogen oxides. This expansion into sui generis uses makes the allocation more unpredictable, with impacts that could make it even more likely to constitute major development in the AONB to which NPPF para 172 would apply. PMM61 states that sui generis uses could include commercial garages and builder’s merchants. The proposed modifications PMM34 PMM35 PMM53 add the wording about sui generis uses at various employment sites across the district. This has been applied universally without having regard to the location of this site in the AONB (Sec 85 of CRoW Act 2000), or giving the AONB great weight (NPPF para 172), or recognising that the scale and extent of development in AONBs should be limited (NPPF para 172).
The Chilterns Conservation Board notes the proposed additional wording on “Provide a landscape-led positive approach to design and layout to limit its impact upon the Area of Outstanding Natural Beauty” but considers that this will be a significant challenge here and that the allocation should be deleted.

In any event the new wording (for any AONB allocations) should refer to ‘conserve and enhance natural beauty of the AONB’, rather than limiting impact upon the AONB. The allocation and policy wording is not NPPF complaint, it does not give great weight to conserving and enhancing natural beauty (NPPF para 172).

The site is within the Chilterns AONB. It is deeply rural greenfield land, its former use was as a wildlife sanctuary. A housing development here of 20 dwellings would not conserve and enhance the Chilterns AONB. Surrounded on three sides by woodland, this is not a logical extension of the built-up area as suggested by para 5.5.73, instead it would form a logical extension to the woodland. The woodland to the north (High Heavens Wood) is Ancient Woodland, as nearby to the south is more Ancient Woodland (Hatches Wood and Badgebury Wood). The site is washed over by the Medmenham Biodiversity Opportunity Area. As such it is a prime location for habitat management and habitat creation. Housing on the site would encroach development into the protected landscape. It is also only a relative short distance to the west to the High Heavens waste site (policy HW17) so impacts should be looked at cumulatively.

Chilterns Conservation Board does not support the weakening of the plan by the deletion of: “For that reason, the viability of the current enterprise is not of great relevance, and it will not justify the release of a site to uses other than community uses.” In our area, it is not unheard of for community facilities like pubs to be deliberately run down as a precursor to an application for a change of use to residential. Viability should be considered when looking at such applications, but so should the need for community facilities, their value for the visitor economy of the Chilterns AONB, and their potential under different ownership or management (eg community run). The wording proposed for deletion was not saying that viability was of no relevance, it simply said it was not of great relevance, to allow it to be assess alongside other factors. The wording should be retained.

The Chilterns Conservation Board welcomes the new sentence on the Chilterns Buildings Design Guide in para 6.160, although rather than ‘will also be relevant’ some stronger wording like ‘will be applied’ would be better.
including policy on AONBs, as these form one of the basic conditions against which neighbourhood plans are tested at examination. The Parish Council is a public body subject to the duty in the Countryside and Rights of Way Act 2000 Section 85.

2. The Chilterns Conservation Board makes various suggestions below on how and where to add policy and supporting text on the AONB. We would like the description of the neighbourhood area in sections 1.2 and 2 to include: “The south eastern section of the neighbourhood area falls within the Chilterns Area of Outstanding Natural Beauty (AONB), nationally designated as one of the country’s finest landscapes, and much of the area that is not designated AONB forms part of the setting of the Chilterns AONB”.

3. Para 3.2 could be updated to the latest version of the NPPF (2019). A reference to the NPPF’s policy on AONBs should be added as follows:

• Areas of Outstanding Natural Beauty (para 172)

4. Para 3.4 should also reference South Beds Local Plan policy on AONBs:

• NE2 – conserving and enhancing the Chilterns Area of Outstanding Natural Beauty

5. Para 5.1 the vision should refer to the Chilterns AONB (alongside the Green Belt).

6. Para 5.2 the objectives should include an objective on conserving and enhancing the Chilterns AONB and the setting of the AONB.

7. Para 5.10 should refer to the Chilterns AONB and explain that “AONBs are intrinsically dark environments (Zone E1 in the Institute of Lighting Professionals (ILP) Guidance GN01: 2011 Guidance Notes for the Reduction of Obtrusive Light) and planning conditions should be applied to restrict and control lighting. Light pollution of all types should be first prevented, by avoiding light where it is not needed, and where it is, by designing lighting to mitigate harm, through shading, height of fixings, beam orientation, LUX, colour temperature in Kelvin and the proposed hours of use.”

8. Policy EB5 Biodiversity Assets it would help to show the traditional orchards and other priority habitats on a map. Central Beds Council may be able to help source a map that you can reproduce. This would carry out the instruction in NPPF para 174 (a) that plans should:

“(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation;”

9. As well as significant areas of lowland calcareous grassland on the Chilterns escarpment, Eaton Bray parish has an unusually large
coverage of Traditional Orchards, as identified on DEFRA’s authoritative mapping database https://magic.defra.gov.uk/MagicMap.aspx. Priority Habitats should be conserved, restored and enhanced (NPPF para 174). Priority Habitats are Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

10. Policy EB5 Biodiversity Assets should refer to chalk grassland, this is a rare and significant Priority Habitat type which the parish is blessed with. We now have a larger area of golf courses in the Chilterns AONB than we have chalk grassland, and to set this in context, the Chilterns is nationally important for chalk grassland. The chalk grassland at Dunstable and Whipsnade Downs SSSI is the only designated SSSI in the parish but are not mentioned in the policy, only (too late) in para 5.12. The SSSI is the number one biodiversity asset in the parish in terms of the hierarchy of designations (see NPPF para 171) so we suggest this policy is amended to

“Policy EB5 Biodiversity Assets
The key biodiversity assets of the Parish are defined as its: chalk grassland, traditional orchards, farmland, veteran trees, woodlands, long-established and visually prominent hedgerows (especially along the main approach roads within the parish), wetlands, wildlife corridors and Species and Habitats of Principal Importance.”

11. Policy BE5 should seek a net gain for biodiversity from all development, to match national policy in the NPPF.

12. Policy EB6 Orchards is welcomed but could go further, planning to protect, enhance, expand, connect, improve the orchards. This would carry out the instruction in NPPF para 174 (b) that plans should:

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

13. Policy EB7 footpath network should mention that “a strategic footpath, the Chiltern Way, which is a 125 mile circular walk stretching around the Chilterns AONB, goes through the parish in the Dunstable Downs.” For more information see https://www.chilternsaonb.org/explore-enjoy/interactive-map.html#id_219

14. Para 5.15 should add new text as follows:

“The panoramic views from the top of the escarpment at Dunstable Downs and Ivinghoe Beacon, and the views from the village towards the dramatic iconic chalk landform of the Downs and Beacon makes this a special and remarkable area of which the parish can be justly proud. These views from and to the Chilterns AONB should be conserved and enhanced. Where there are strong views of sites from the Chilterns escarpment land should not be developed. Equally where development would damage views to the hills, particularly views from public footpaths, by blocking or
interfering with open views to the hills, development should not proceed.”

Please see the Chilterns Conservation Board’s Position Statement on Development Affecting the Setting of the AONB, available at https://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html. This explains how developments outside the AONB but in its setting can affect the AONB. It signposts to the Chilterns AONB Management Plan policies concerning AONB setting.

15. Policy EB13 Sustainability should refer the Chilterns AONB and its setting at the end:
“…scheme is located beyond the setting of the Conservation Area or other heritage assets and Chilterns AONB and does not lie within a designated Local Gap or Local Green Space, or harm the setting of the Chilterns AONB.”

This is because renewable energy schemes like solar farms would face south towards the AONB and would harm views and cause glint and glare. Wind farms could break the skyline and the motion could disrupt the tranquillity of views out from the escarpment. The Chilterns Conservation Board has further advice in a Position Statement on Renewable Energy, available at https://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html.

16. The neighbourhood plan has missed some important opportunities to achieve its objectives. The plan could also designate Local Green Spaces to protect sites in the parish like community recreation spaces. The plan could also identify Valued Landscape, for example the land outside the Chilterns AONB but forming part of its setting and important for safeguarding views to and from the AONB. For more information on Local Greenspace see NPPF para 99-101 and on Valued Landscape see NPPF para 170. It could also identify and map important views and protect viewcones, for example views to and from the top of the Chilterns escarpment.

17. The Chilterns Conservation Board will wish to stay involved and assist in the future with plan proposals as they develop, to ensure that full and proper account is taken of the need to conserve and enhance the natural beauty of the Chilterns AONB. We are the statutory body for the Chilterns AONB (see Appendix 2).

18. We have a model AONB policy and some advice on our neighbourhood planning webpage. The model policy is reproduced overleaf (supplied), and could be incorporated as a new standalone policy within the Eaton Bray Neighbourhood Plan.

19. For more information and advice please contact the Chilterns Conservation Board at lmurfett@chilternsaonb.org.

20. We wish the Parish Council all the best for the examination of their Neighbourhood Plan.

<table>
<thead>
<tr>
<th>North Herts Local Plan Main Mods</th>
<th>NHDC</th>
<th>MM157 - Page 110 before Policy NE1 (New Policy NEx and supporting text) (EDED156)</th>
</tr>
</thead>
<tbody>
<tr>
<td>In bullet point 3 of the new paragraph summarising the North Herts District Green Infrastructure Plan, the order of “other valued landscapes and the Chilterns AONB” should be reversed to:</td>
<td>2.4.19</td>
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<td>“The Chilterns AONB and other valued landscapes” or alternatively separated into two separate bullets:</td>
<td></td>
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<td>- the Chilterns AONB</td>
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<td>- other valued landscapes”</td>
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<tr>
<td>This is because:</td>
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<tr>
<td>1. the current order does not give the &quot;great weight&quot; to the AONB that NPPF para 172 instructs should be given.</td>
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<tr>
<td>2. it does not follow the instruction about hierarchy in the NPPF para 170 that: &quot;Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.&quot;</td>
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<td>3. it does not make sense grammatically, it starts with &quot;other valued landscapes&quot; without explaining what they are 'other' to. The preceding bullets are about habitats.</td>
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</table>

**MM163 Policy NE3**

Chilterns Conservation Board strongly objects to the weakening of this policy on the Chilterns AONB.

We supported the submission version of this policy in October 2016, noting that "Policy NE3 is based on (with minor variation) joint work by the Chiltern s Conservation Board and planners from across the thirteen planning authorities of the Chilterns AONB through the AONB Planning Forum. The AONB Planning Forum developed the model AONB planning policy in 2016 for inclusion across all the local plans of the Chilterns AONB in order to achieve cross-boundary consistency. It is an example of cooperation on the natural environment on a larger than local issue."

There is no justification for the changes which weaken the policy. In particular the addition of the words "where possible" in criterion (b) to read "conserves and where possible enhances the Chilterns AONB’s...".

"Where possible" is not consistent with NPPF para 172, nor with the Countryside and Rights of Way Act 2000 section 85 which sets a duty to have regard to the purpose of conserving and enhancing the natural beauty of AONBs. Both say "conserve and enhance", not "conserve and where possible enhance". This is not a matter of which version of the NPPF you use, this is nothing new, the CRoW Act established "conserving and enhancing" as the statutory duty in the year 2000.

We also object to the changes at to the policy at criteria (d) which weakens the status of the Chilterns AONB Management Plan from a plan that proposals should meet the aims of, to something they should have regard to.

Similarly, we object to the changes at to the policy at criteria (e) which weakens the status of the Chilterns Buildings Design Guide from guidance that proposals should meet the aims of, to something they should have regard to.
Omit these proposed main mods to Policy NE3:
1. Do not add to (b) "where possible" before enhance
2. Do not change (d) to 'has regard to'
3. Do not change (e) to 'has regard to'.

**MM164 - Page 112 paragraph 11.12**
The revised NPPF in 2018 has deleted the words “within these designated areas” from the paragraph on major development and AONBs. This introduces a question about whether the major development test is only to be applied in AONB or also in some cases in the setting of AONB, which puts this main mod in doubt.

Old NPPF para 116:
Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

New NPPF para 172
Planning permission should be refused for major development (see footnote 55) other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

Footnote 55 goes on to refer to designation purposes, which are set out in the CRoW Act. The legal duty on local authorities set out in section 85 of the CRoW Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of AONB does not just apply within the AONB; the only consideration is whether land in the AONB is affected, not where the effect originates. Similarly, the instruction in the NPPF paragraph 172 to give ‘great weight’ to conserving landscape and scenic beauty applies regardless of whether a development is inside the AONB or on land outside but affecting it. The NPPG also draws attention to proposals ‘which might have an impact on the setting of AONBs’.

The point is that the deletion of “in these designated areas” suggests that major development could in some circumstances be applied to setting. Given this, the main mod is not appropriate. Also the footnotes to this paragraph need updating as they refer to the previous version of the NPPF. References to NPPF para 116 should read 172.

Paragraph 11.12 could usefully refer to the new sentence added to the NPPF para 172: “The scale and extent of development within these designated areas should be limited.”

and to the new information about how to assess whether a proposal is major development in footnote 55: “For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

Omit main mod addition of ‘within its boundaries’
Update footnotes to refer to revised NPPF.

| Oxon Plan 2050 Call for Ideas | OCC | Q1 | 2.4.19 |
Which broad strategic-scale location in Oxfordshire do you think may be suitable for considering as options in the Oxfordshire Plan?

Please designate a Green Infrastructure buffer around the Chilterns AONB as a zone for additional environmental protection.

Q2
What type and size of development (or other proposal) do you think could be located at your proposed location (as identified in Q1)?

Answer: Environmental enhancement / protection.

The Cotswolds, Chilterns and North Wessex Downs AONBs are nationally protected as some of the finest areas of countryside in the UK. They have the same status in planning as National Parks. They are national assets that bring economic benefits and tourism as well as ecosystem services and health and wellbeing benefits. The AONBs themselves are protected with policies in the NPPF para 172 about great weight and major development. But the setting of the AONB has more limited protection and is subject to many pressures for development which is having a cumulative effect on the resilience of the AONBs.

For example there are important panoramic views from the chalk escarpment over Oxfordshire, from places like Swyncombe Downs, Watlington Hill, Beacon Hill and Chinnor Hill. These majestic views are a recreational asset and green infrastructure resource. Like the AONB the setting also needs great emphasis and investment on its conservation and enhancement. The designation of a buffer (eg 3km) around the AONB as a GI corridor as shown on our map attached would help safeguard the beauty and wildlife of the AONB at a strategic scale. A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away.

Chilterns Conservation Board is concerned about the impact on the AONB of development pressure on the edges of major towns and villages adjoining the AONB. Designating this buffer zone would be a good example of meeting the legal duty of local authorities towards the AONB in the Countryside and Rights of Way Act section 85, which applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). Outside the Chilterns AONB is an area north of Reading where additional protection like a green infrastructure AONB buffer, or designation of a strategic gap, or a new north of Reading Green Belt, would help protect the setting of the AONB. This is an area which we have proposed to Natural England as suitable for expansion of the Chilterns AONB through an AONB boundary review, but this is a long process and could be addressed in the shorter term by an environmental protection allocation in the Oxon Plan 2050.

Q3
Why do you think this is a good location (as identified in Q1) for your suggested use?

What do you think are the benefits to the local or Oxfordshire area in terms of social, environmental and economic benefits? The location is adjacent to the Chilterns AONB, so is to some extent fixed, although the width of the Green Infrastructure AONB buffer could be varied (we have proposed 3km wide for simplicity).
Within this area, there could be additional investment in strategic GI, with corridors for wildlife and walking/cycling/ horseriding to link populations to the recreation opportunities in the Chilterns AONB. For instance between Chinnor and Aston Rowant this buffer area contains the Ridgeway National Trail.

Q4
Are there any challenges that might need to be overcome to bring this forward?
No, it is a straightforward proposal that would demonstrate good practice under NPPF para 171 and would be in line with the legal duty of local authorities towards the AONB in the Countryside and Rights of Way Act section 85, which applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB).

Q5
Is there any other information that you think we should know to help us to assess the site?
No but the Chilterns Conservation Board would be happy to help assess on advise on the appropriate buffer width taking account of local topography and viewsheds.

Our key concerns, which we have used these to assess the content of the EIA Scoping Report, are:
- noise and effects on tranquillity from overflying the Chilterns AONB
- air pollution and effects on sensitive habitats in the Chilterns including protected sites of national and international importance
- cumulative impacts from the combined changes in flightpaths from Luton and Heathrow - it is important that in any redesign of flightpaths there is careful design to avoid harm to the tranquillity of the AONB, and take all opportunities to reduce noise over the AONB (e.g. Bovingdon stack)
- people walking, cycling, riding or volunteering in the AONB are likely to be outdoors and seeking tranquillity, so are sensitive to noise disturbance and the sight of aircraft flying overhead.
- Light pollution from the airport and aircraft overhead affecting the dark night skies of the AONB, which is an intrinsically dark zone, and impacting on people’s opportunities to star gaze and experience darkness.
- identifying opportunities for AONB mitigation and enhancement.

General points on EIA Scope
1. The Luton Airport expansion project should be assessed against whether it achieves Environmental Net Gain, in the light of the Government’s 25 Year Environment Plan and the Draft Environmental (Principles and Governance) Bill 2018, and renewed public concern about climate change. Rather than the applicant’s vision “to actively manage environmental impacts at the local and wider levels in line with our wider commitment to responsible and sustainable development” it should be bolder in its environmental ambition and commitments. At the moment it covers understanding impacts and mitigating them, but it should refer to avoiding them,
using the mitigation hierarchy: 1. avoid impacts 2. mitigate and only then 3. compensate for residual impacts.

2. Although we welcome the inclusion of climate change and greenhouses gases within the scope of the EIA, and that this includes surface access as well as operation of aircraft (Table 1, Vol 1), the scope of the assessment has been wrongly curtailed. It is hard to think of another project in the sub-region that has the potential to contribute more greenhouse gas emissions than the expansion of Luton Airport. It has national and global consequences. We question the exclusive of cumulative effects in relation to greenhouse gasses. Para 8.6.10 of Vol 1 assert: "It is not relevant to assess the cumulative effects with regard to CCR as the focus of this assessment is only the Proposed Development itself."

Why? We strongly disagree with the conclusion at para 9.6.4 of Vol 1 “The requirement to present the impact of the Proposed Development in the context of the UK Carbon budgets is a cumulative assessment and as such it is concluded that further cumulative GHG emissions is scoped out.”

3. Section 8 on climate change should be expanded to address mitigation. It currently focuses on adaptation and resilience (i.e. impacts of climate change on operation of an expanded airport) rather than addressing an expanded airport’s role in contributing to climate change. Para 8.8.1 Vol 1 admits that climate change mitigation measures or mechanisms to reduce the potential significant effects are not yet developed and will be developed with specialists. Why such an after-thought?

4. We question in Table 1 under Biodiversity the scoping-out of effects on watercourses. The impacts on the biodiversity and function of Chilterns chalk streams should be assessed, with careful scrutiny of where additional water supply for the expanded airport will come from. Chalk streams are an internationally rare habitat that are suffering from over-abstraction which is decreasing water levels in the streams and shortening their functional length. The River Ver, a chalk stream which supplies Luton with its public water supply, is already over-abstracted and the river bed is consistently dry for much of its former functional length and no longer flows at all within the AONB. The small Water Soil and Geology zone of influence (shown on Figure 21.2) is derisory given this important chalk stream.

5. In Table 1 the scope of the Landscape and Visual Assessment (LVIA) should include the following in order to meet recommended practice in the Landscape Institute’s Guidelines for Landscape and Visual Impact Assessment (3rd Edn):

- Landscape character, with particular attention to the impacts of moving approximately 4,000,000m3 of earth, excavated from the land to the east of the platform, creating large craters into which car parks will be placed, to win material for building up the airport platform. The steep 1 in 3 gradient of the proposed slopes, and the artificial shape of embankments (see Figure 3.1) should be assessed and compared with the existing natural chalk hillside.
- Tranquillity, including noise, vapour trails, motion and effects on perception of unspoilt and peaceful places. Tranquillity is
currently scoped out of the LVIA part of the EIA, as explained at para 18.5.20. We disagree.

- Sequential effects eg on a series of viewpoints or along popular walks like the Chiltern Way
- Cumulative effects eg airport plus other planned housing, new roads, employment growth
- Night time views as well as daytime views in order to identify and address any increase in light pollution from an expanded airport and from aircraft overhead. This will help safeguard dark night skies and the experience bright stars from the Chilterns AONB.

6. Zones of influence for the development (summarised in Figure 21.1 in Vol 2) have been drawn far too closely. Much wider zones are needed for all 6 categories. Assessments must include the area under the flightpaths, protected habitats likely to be affected by air pollution, impacts on the River Ver – an internationally important chalk stream, and the natural beauty, dark skies and public enjoyment of the nationally designated landscape of the Chilterns AONB. The impacts of an expanded Luton Airport go much wider that Luton town and its immediate environs, and so should the EIA.

7. The Air Quality monitoring appears to focus on Air Quality Management Areas (monitoring cars in already polluted urban areas) and lacks any consideration of effects of air pollution on natural habitats. See for more information Plantlife’s report We Need To Talk About Nitrogen. This is especially important for the SSSIs, and it is critically important for the Chiltern Beechwoods Special Area of Conservation (mapped on Figure 17) which is an internally important biodiversity designation. All three of the Special Areas of Conservation in the Chilterns AONB (Chilterns Beechwoods SAC, the Aston Rowant SAC and Hartslock Wood SAC have already breached their critical loads for air pollution. For example, see Natural England, Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018:

"The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it."

The Chilterns Beechwoods Special Area of Conservation (SAC) is in close proximity to motorways and major roads which are likely to experience increased traffic from the expansion of Luton Airport. The Aston Rowant SAC is possibly the only SAC in the UK which is actually severed by a motorway, with the vast cutting of the M40 motorway constructed through this nature reserve in the 1960s. The M25 also cuts through the Chilterns through the AONB. Increased traffic for Luton Airport could have an effect on air quality, noise and habitats. Air pollution and effects on sensitive habitats and protected sites of national and international importance must be carefully addressed through Environmental Impact Assessment and Habitat Regulations Assessment.
8. For landscape and visual considerations, the 5km proposed study area is too narrow. Given the topography, Luton Airport might be visible from wider parts of the Chilterns Hills. Rather than just views of the airport, other visual effects like aircraft moving through the sky above the wider AONB creating motion and vapour trails should be addressed too.

9. The proposed methodology for Cumulative Effects Assessment (CEA) fails to consider more than a zone local to the Airport. The thresholds proposed at Table 21.3 covers too small an area. The list of developments scoped-in for cumulative effects testing have been shared with local planning authorities but not available for other stakeholders to comment. Chilterns Conservation Board considers that the CEA should include other projects which are putting pressure on the Chilterns AONB and which should be scoped into the CEA:
   • HS2
   • The Ox-Cam expressway and growth corridor
   • Heathrow expansion (also an NSIP). There is a clear interrelationship between plans for airport expansion at Heathrow and Luton, both of which might happen. The change in flight paths at Heathrow could have a direct impact on Luton airport’s flightpaths and the height planes fly at over the Chilterns AONB. Heathrow third runway should clearly be scoped in to the cumulative effects assessment
   • Housing and employment growth of Aylesbury into a Garden Town, the major expansion of housing at nearby Hemel Hempstead and in future likely development to the west of Luton.

10. The area east of Luton, including land within the airport’s proposed development boundary, is candidate land for AONB boundary review. Although Figure 18.1 shows the current AONB boundary, it should also show the land that has been proposed by the Chilterns Conservation Board for inclusion in the Chilterns AONB, in a still live application made to Natural England. The area to the east of Luton is a potential candidate for extension of the AONB based on criteria published by Natural England relating to landscape quality, scenic quality and relative wildness, relative tranquillity and cultural heritage (Guidance for assessing landscapes for designation as National Park or AONB, 2011). In September 2010 the North Herts DC cabinet passed a resolution to support consideration of the area as AONB. The area has a clear affinity with the rest of the Chilterns. It contains clearly recognisable Chilterns features such as chalk streams and associated dry valleys and small settlements, with isolated farms and dwellings with red brick and flint as dominant building materials. The woodland cover is good, with much of it being Ancient Woodland. It is of the same high quality as landscape in the AONB, the current boundary is arbitrary, following the A505 road and not natural features (attached: map and extract from our AONB boundary review application).

11. It is not clear why the airport expansion involves the removal of high quality attractive greenfield landscape to east of the airport, in preference re-developing and extracting spoil from beneath the rundown brownfield employment land north of the airport (Percival Way
area etc). This alternative should be explored as a reasonable alternative under Schedule 4 of the EIA Regulations. Explaining the different options for the location of the terminal, as consulted on in the non-statutory Future LuToN consultation in 2018, is not sufficient.

**Detailed points on the EIA Scoping Report and appendicies**

12. Why is the Air Quality study area (a square of 15km) skewed so that Luton Airport is not in the centre of the study area? See Figure 6.1 in Volume 2. The area west of Luton including the Chilterns AONB is mainly excluded, and the area north and east of Luton is covered more than its share. We object to the air quality study area for the EIA because it fails to cover the flightpaths. Luton Airport already affects all of the Chilterns AONB as it lies under the flight paths and holding stacks for Luton and Heathrow airports. The EIA should investigate what the air quality effects be during the operational life of the expanded airport and over the full area that will be impacted. Passenger’s journeys to airports are typically long and the airport has a far longer reach that the study area shows.

13. Figure 6.3 and 6.7 why are there so few (only 1) air quality automatic monitors in Luton Borough Council’s area near the airport itself? Why are there none on the road network between the airport and junction 10 of the M1? Especially since the EIA Scoping Report states at para 2.3.24 that “The majority of vehicles accessing LTN do so from the M1 and Luton via New Airport Way (the A1081)”. There is also an absence of monitors on the A6 north of Luton and the A505 north east of Luton which should be addressed to consider air quality impacts of increased traffic from the proposed airport expansion.

14. In is unclear from Figure 10.1 showing noise monitoring locations whether these are existing or proposed new noise monitoring locations. It is difficult to comment on the adequacy of these locations without information being provided on likely flightpaths. Without this, they could be in the wrong place.

15. On Figure 10.1 noise monitors are shown within the Chilterns AONB villages of Dagnall and Jockey End, but none further west e.g. around Tring, and none at key visitor destinations like the National Trust’s Ashridge Estate, Iv inghoe Beacon, the Dunstable Downs, Sharpenhoe Clappers, and Galley and Warden Hills. This shows a bias towards residential effects in villages, and little regard to assessing the impact on visitors. As a nationally protected landscape on the doorstep of London and many large settlements, the tranquillity of the Chilterns AONB is of national importance, not just to residents, but visitors and tourists too. The assessment should give weight to the AONB as a national asset and recognise that people walking, running, cycling, riding or volunteering in the AONB are likely to be outside and seeking peace, so are especially noise sensitive. The EIA should assess where people visit for leisure time and when people are more likely to be outdoors in the Chilterns Area of Outstanding Natural Beauty (AONB). It would be informative to map areas for existing ambient noise levels and ensure that quiet areas of protected countryside remain as quiet as possible, recognising their importance for quiet recreation, health and wellbeing. We note that CAP1616 guidance requires that specific attention is given to tranquillity of AONBs.
16. Figure 11.2 these clipped versions of the historical maps should be displayed larger (1 page each at A3), they are reproduced too small and not a good enough resolution to provide useful data.

17. Figure 18.1 the LVIA constraints plan uses a 5km buffer around the airport and excludes most of the land in the Chilterns AONB further west and north. Only one proposed viewpoint (at Ivinghoe Beacon) is shown within the Chilterns AONB on Figure 18.4. This is not enough. Para 18.4.11 of Vol1 explains of the existing airport “The airport is a prominent and visually intrusive feature within views from the surrounding area”, and likely to be more so with an expanded airport. Suggest include a map of Zones of Theoretical Visibility, overlain with the Chilterns AONB boundary, to assess other viewpoints needed. The study area for the LVIA should be re-assessed once ZTV work has been carried out.

18. Why are no viewpoints included within the site boundary (Figure 18.1) eg Wigmore Park and from the Public Right of Way over attractive chalk fields sloping towards Winch Hill to the east? The hillside of fields would be excavated to a lower level with material used to build up the runway, before being converted to car parks. These are significant landscape and visual impacts but are neglected by the proposed LVIA.

19. Why is there no map of Public Rights of Way, to help identify viewpoints? Two important strategic recreation assets, the Chiltern Way footpath (a 125 mile waking route though some of the finest scenery in the country) and the Chilterns Cycleway (a 170 mile circular cycle route through the Chilterns AONB) both run close to the east of the development boundary. There are public rights of way over highly attractive chalk landscape which would be altered beyond recognition, and this should be explored in the LVIA part of the EIA.

20. Figures 21.2 planning applications and 21.2 local plan allocations do not assess a wide enough geographic area. Other major proposals are likely to have a cumulative environmental impact on traffic, carbon emissions, waste, water consumption, habitats and tranquillity together with the growth of Luton Airport. The EIA Scoping Report has missed HS2, the growth of Aylesbury into a Garden Town, the major expansion of housing at nearby Hemel Hempstead and in future west of Luton, Heathrow third runway because of flightpaths implications at Luton, and the Ox-Cams expressway and growth arc. It should also recognise the current planning application (ref 19/00428/EIA) submitted by Luton Airport to Luton Borough Council to vary the noise conditions on the airport to increase both day and night time noise.

<table>
<thead>
<tr>
<th>Luton Airport Expansion Design Principles</th>
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<tr>
<td>The Chilterns Conservation Board would be supportive of changes that reduce noise over the Chilterns, and we can see that the proposals for higher climbs, steeper descents, the end of stacking and quieter planes are likely to be positive. Conversely we are likely to oppose proposals which harm tranquillity in the Chilterns AONB. From your summary, it seems the AD6 proposals are likely to involve no change for the Chilterns AONB, and the FASI-S project is where we should focus our time as stakeholders.</td>
<td>30.4.19</td>
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Our initial response on the FASI-S Design Principles you showed us are:

1. Chilterns Conservation Board should have been involved sooner. The Chilterns Conservation Board is the statutory independent corporate body for the Chilterns Area of Outstanding Natural Beauty, set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000. The Chilterns Conservation Board is a statutory consultee for National Policy Statement consultations, a prescribed consultee for major infrastructure projects that affect the Chilterns AONB and an interested party for examinations in connection with Nationally Significant Infrastructure Projects that may affect the Chilterns AONB (as set out in the Infrastructure Planning (National Policy Statement Consultation) Regulations (2009), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations (2009) and the Infrastructure Planning (Interested Parties) Regulations (2010)). We are concerned that the Focus Group has been predominately resident and local authority dominated (apparent from the Design Principles matrix and its results) and has not so far included either local or national bodies with a remit for the AONB. We suggest you also include the Chilterns Conservation Board, the Chiltern Society, and Natural England (as the statutory consultee which oversees protected landscapes of National Parks and AONBs), plus organisations to represent visitors and the recreation sector. As a nationally protected landscape on the doorstep of London and many large settlements, the tranquillity of the Chilterns AONB is of national importance, not just to local residents, but visitors and tourists too.

2. The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of CRoW Act 2000). There is further advice on this in CAP1616 including a link to the DEFRA, Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONB) and the Norfolk and Suffolk Broads Guidance Note, 2005. The process for both AD6 and FASI-S should ensure that you have both had regard to the AONB and demonstrated that you have done it; see CAP161 para B77: “Change sponsors are required to have regard to these statutory purposes when developing airspace change proposals”.

3. At the moment the Design Principles are lacking any reference to conserving and enhancing the natural beauty of the Chilterns AONB. As an airport with flightpaths directly over the AONB, it is relevant to include a design principle referring to and giving consideration to the AONB. We suggest:

“Safeguard the tranquillity of the nationally protected landscape of the Chilterns AONB”

4. Adding a Design Principle on the AONB is needed because the current proposed principle on meeting government policy is too broad. The AONB is likely to get overlooked among the myriad of other policy considerations. As drafted it is not a useful principle
because no option can meet every element of government policy, so no option is likely to score ‘yes’ or ‘no’ in the clear and useful way you need for assessing options. Also as drafted it does not mention complying with legislation (of which there will be many relevant laws, for example the Countryside and Rights of Way Act 2000 on the AONB, and others on conservation areas, listed buildings, biodiversity etc).

5. The assessment of tranquillity in the AONB should involve more than testing whether noise levels breach 57 dB LAeq 16hr and 48 dB LAeq8hr. The assessment should give weight to the AONB as a national asset and recognise that people walking, running, cycling, riding or volunteering in the AONB are likely to be outside and seeking peace, so are especially noise sensitive. The EIA should assess where people visit for leisure time and when people are more likely to be outdoors in the Chilterns Area of Outstanding Natural Beauty (AONB). It would be informed by mapping areas for existing ambient noise levels and ensuring that quiet areas of protected countryside remain as quiet as possible, recognising their importance for quiet recreation, health and wellbeing. We would be happy to assist with design of a study of tranquillity for the Luton airspace project if helpful.

6. We suggest considering mobile noise monitoring at locations in the AONB around Tring, and at key visitor destinations like the National Trust’s Ashridge Estate, Ivinghoe Beacon, the Dunstable Downs, Sharpenhoe Clappers, and Galley and Warden Hills.

MATTER 6 STRATEGIC SITES (POLICY SA1) – NORTH OF LUTON

CCB submitted an extensive statement addressing Matter 6 - Issue 4 - Inspector’s questions 4, 6, 8 and 9 regarding the impact of the SA1 North of Luton allocation on the Chilterns AONB. CCB’s full statement available online at https://centralbedfordshire.app.box.com/s/0gole560uukhti20877aqzl8tgw165t6/file/466193015007

In summary, the Chilterns Conservation Board objects to the scale of the proposed strategic urban extension of Luton northwards because of harm to Chilterns AONB. It conflicts with national policy, with the Chilterns AONB Management Plan policies on development, and with emerging local plan Policy EE7. The M1-A6 Strategic Link Road has been positioned to maximise the amount of developable land. The strategic development would constitute a major encroachment of built development northwards. Buildings would block the view of the chalk escarpment from the public rights of way within the site. The view to Galley and Warden Hills from the AONB on the site and from John Bunyan Way footpath would be harmed.

The Chilterns Conservation Board seeks amendments to SA1 to reduce impact on the Chilterns AONB. The allocation should be redesigned to exclude all land in the Chilterns AONB (including the road). It should also remove development from the eastern bowl of
the site which is in the setting of the AONB and harmful to important views from Galley and Warden Hills.

**Recommended changes SA1**
The Chilterns Conservation Board recommends the allocation is amended to:

1. **Exclude all land in the Chilterns AONB from SA1.**
2. **Delete the link road from the Chilterns AONB.**
3. **Scale back the urban extension.**
4. **Remove development from the eastern bowl of the site which would harm important views from Galley and Warden Hills.**
5. **Recognise in the policy that the development is in the setting of the Chilterns AONB.**
6. **State that the development should be landscape-led to ensure harm is avoided and reduced.**
7. **Provide detailed rather than vague mitigation commitments.**
8. **Add reasoned justification (lower case text) to accompany Policy SA1.**

**Conclusion**
The Central Beds Local Plan’s proposed strategic allocation SA1 north of Luton involves major development in the AONB without passing the national policy tests, and does not give sufficient weight to the AONB and its setting.
The Chilterns Conservation Board is grateful for the opportunity to make these representations at the Examination.

<table>
<thead>
<tr>
<th>Chilterns and South Bucks Planning Application Requirements</th>
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<tbody>
<tr>
<td>The requirements for applications for development in the Chilterns Area of Outstanding Natural Beauty should be strengthened.</td>
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<tr>
<td>1. Landscape and Visual Impact Assessment should be required for major application reserved matters applications. It is not acceptable to only require LVIA for outline applications, as at outline stage no detail may be available on layout, heights or materials.</td>
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<tr>
<td>2. Landscape and Visual Impact Assessment should be required for most applications in the Chilterns AONB, both minor and major, and for developments in the setting of the AONB. This would follow the advice in the new adopted Chilterns AONB Management Plan 2019-2024 Policy DP5 &quot;Require a LVIA that meets the standards in the GLVIA latest edition for development in the AONB or affecting its setting&quot;.</td>
</tr>
<tr>
<td>3. The checklist refers to an old version of the Guidelines for Landscape and Visual Impact Assessment produced by the Landscape Institute. The current version is the 3rd edition. The safest way to cover this is probably to refer to the ‘latest version of the GLVIA, currently the 3rd edition’.</td>
</tr>
<tr>
<td>4. For major development in the AONB, there should be a requirement to submit an assessment of the application against the major development tests in para 172 of the NPPF. The Chilterns AONB is a nationally designated landscape which should be given 10.6.19</td>
</tr>
</tbody>
</table>
5. We suggest the inclusion of external lighting information for “All developments where proposed external lighting may affect the local amenity, a Listed Building or Conservation Area, AONB, open countryside, or where the presence of bats or other nocturnal animals has been identified.” This is because on lighting and dark skies, locations within AONBs are recommended by the Institute of Lighting Professionals as E1 for which the lighting environment is Intrinsically Dark zones, see table on page 5 of [https://www.theilp.org.uk/documents/obtrusive-light](https://www.theilp.org.uk/documents/obtrusive-light). In these locations “Details should be provided of proposed external lighting (including types of light, shading, height of fixings, LUX, colour temperature in Kelvin) and the proposed hours of use. These details shall include a layout plan with beam orientation and a schedule of the equipment in the design.” And add reference to “Institution of Lighting Professional Guidance Notes for the Reduction of Obtrusive Light GN01, 2011”

6. The Ecology Assessment checklist should include proposals affecting Priority Habitats and Priority Species (listed under Section 41 of the NERC Act (2006)). This should refer to “The MAGIC website provides authoritative geographic information about the natural environment from across government see [https://magic.defra.gov.uk/](https://magic.defra.gov.uk/) and applicants will be expected to consult the Buckinghamshire and Milton Keynes Environmental Records Centre”.

7. The weblink on your consultation page to [http://www.chilterns.gov.uk/planning/par](http://www.chilterns.gov.uk/planning/par) is a broken link, so I have not been able to view the Chiltern list, but I am assuming they are both the same. Please can you fix the weblink asap for this consultation?

<table>
<thead>
<tr>
<th>A4010 &amp; A4129 Safety Improvement Works - Consultation</th>
<th>BCC</th>
<th>A4010 and A4129 Safety Improvement Works</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you support the following proposal? Site 1a – West Wycombe entry feature north of the Bradenham Road Railway Bridge and residential properties, A4010 Bradenham Road, West Wycombe. Proposed installation of dragons teeth road markings together high friction surfacing and a speed limit roundel on approach to existing speed limit change</td>
<td></td>
<td>12.6.19</td>
</tr>
</tbody>
</table>
No. The Chilterns Conservation Board recommends deleting the proposed dragon’s teeth and red surfacing at this location and a solution that is more sympathetic to the rural AONB location. Here the Council has a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to conserving and enhancing the natural beauty of the Chilterns AONB. The Chilterns Conservation Board worked with our County Councils, including Bucks CC, to jointly develop advice in a document "Environmental Guidelines for the Management of Highways in the Chilterns", available online here [https://www.chilternsaonb.org/uploads/files/ConservationBoard/Environmental_Guidelines_Highways.pdf](https://www.chilternsaonb.org/uploads/files/ConservationBoard/Environmental_Guidelines_Highways.pdf). This explains that part of the attraction of the Chilterns is the network of ancient lanes and holloways, and that the informality and apparent ‘naturalness’ of these roads is fundamental to their appeal. The special rural character of a section of road can often depend upon small features, and changes to these can greatly alter perceptions of the area. Signing should be kept to a minimum and should be located to reduce clutter. Paragraph 84 explains that “Coloured surfaces are visually intrusive and should not be used unless there are overriding safety considerations, which cannot be addressed in any other way. Where a coloured surface is considered essential, buff should be preferred to red. Wherever possible all road, footway and cycleway surfaces should be black.”

**Site 1b – A4010 Bradenham Road**

Proposed installation of dragons teeth road markings together high friction surfacing and a speed limit roundel on approach to existing speed limit change

No. Ditto Site 1a

**Site 3 – Monks Risborough School frontage, A4010 Aylesbury Road**

Proposed reinstatement of existing crossing high friction surfacing, updated lighting and new yellow backed signage.

No. This needs a solution that is more sympathetic to this rural AONB location. The proposed yellow backed signage will be more visually intrusive than the existing signage, and adds clutter. No details have been provided on the design of the updated lighting. The new Chilterns AONB Management Plan 2019-24 contains a new policy DP8 on lighting: “Keep skies dark at night by only using light where and when needed. All new lighting should be the minimum required and meet or exceed guidance for intrinsically dark zones.” AONBs are intrinsically dark environments (Zone E1 in the Institute of Lighting Professionals guidance) requiring restrictions and control of lighting. Light pollution of all types should be first prevented, by avoiding light where it is not needed, and where it is, by designing lighting to mitigate harm, through shading, height of fixings, beam orientation, LUX, colour temperature in Kelvin and the proposed hours of use. For example, downward pointing, shielded, operated on timer, and with a ‘warm white’ colour temperature of 2700-Kelvin maximum. The colour and design of lamp posts also needs care, we recommend pale green not grey lamp posts. The Council has a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to conserving and enhancing the natural beauty of the Chilterns AONB. The Chilterns Conservation Board worked with our County Councils, including Bucks CC, to jointly develop advice in a
document “Environmental Guidelines for the Management of Highways in the Chilterns”, available online here

Site 4 – Bradenham Bends south of Bradenham Wood Lane, A4010 Bradenham Road, Bradenham
Proposed new road markings with ‘SLOW’ on both approaches and installation of upgraded carriageway road studs along this section of the A4010.
No.
The Chilterns Conservation Board recommends deleting the yellow backed signs and solar LED road studs, and finding a solution that is more sympathetic to the rural AONB location. The proposed yellow backed signs are visually intrusive and add clutter. The LED studs will cause light pollution. Here the Council has a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to conserving and enhancing the natural beauty of the Chilterns AONB. The Chilterns Conservation Board worked with our County Councils, including Bucks CC, to jointly develop advice in a document "Environmental Guidelines for the Management of Highways in the Chilterns", available online here https://www.chilternsaonb.org/uploads/files/ConservationBoard/Environmental_Guidelines_Highways.pdf. This explains that part of the attraction of the Chilterns is the network of ancient lanes and holloways, and that the informality and apparent ‘naturalness’ of these roads is fundamental to their appeal. The special rural character of a section of road can often depend upon small features, and changes to these can greatly alter perceptions of the area. Signage should be kept to a minimum and should be located to reduce clutter.

Do you support the following proposal for site 5?
Site 5 Zebra crossing and traffic islands between Culverton Hill and Clifford Road, A4010 Wycombe Road, Prince Risborough
Yes

Site 6 – Longwick Road entry feature north of the Hypnos Site on A4129 Longwick Road, Prince Risborough
Proposed installation of dragons teeth road markings together with high friction surfacing and a speed limit roundel on approach to existing speed limit change. Including installation of a new Vehicle Activated Sign (VAS) ‘SLOW DOWN’ for eastbound traffic

Yes

Site 7a – Longwick Road pedestrian crossing adjacent to Brooke Road, A4129 Longwick Road, Princes Risborough
Yes

Site 7b – Aylesbury Road pedestrian crossing adjacent to The Retreat on A4010 New Road, Princes Risborough
Yes
Do you support the following proposal for site 8?
12. Proposed maintenance and improvements to footpath entrance to improve visibility for pedestrians accessing this location
No
The Chilterns Conservation Board is concerned that the vegetation helps soften and screen the bridge, so care should be taken not to undertake radical vegetation clearance that would expose it (no details have been given on how much clearance is proposed).

Do you support the following proposal for site 9?
Proposed installation of dragons teeth road markings, high friction surfacing and a speed limit roundel on approach to speed limit. Including installation of a new dual message Vehicle Activated Sign (VAS) ‘SLOW DOWN/SCHOOL’ for southbound traffic.
No
The Chilterns Conservation Board recommends deleting the proposed dragon’s teeth and red surfacing and Vehicle Activated Sign at this location and finding a solution that is more sympathetic to the rural AONB location.

Do you support the following proposal for site 10?
Proposed installation of dragons teeth road markings together high friction surfacing and a speed limit roundel on approach to existing speed limit change. Including installation of a new Vehicle Activated Sign (VAS) ‘SLOW DOWN’ for northbound traffic.
No. The Chilterns Conservation Board recommends moving the proposed dragon’s teeth and red surfacing and Vehicle Activated Sign further northwards into the built-up area of Princes Risborough outside the AONB. As proposed they are in the AONB and the flashing VAS would be an urbanising detractor to the AONB, adding clutter and blocking visibility for walkers, riders and cyclists using the Ridgeway National Trail. No details have been provided on the design of the updated LED street light. The new Chilterns AONB Management Plan 2019-24 contains a new policy DP8 on lighting: “Keep skies dark at night by only using light where and when needed. All new lighting should be the minimum required and meet or exceed guidance for intrinsically dark zones.” AONBs are intrinsically dark environments (Zone E1 in the Institute of Lighting Professionals guidance) requiring restrictions and control of lighting. Light pollution of all types should be first prevented, by avoiding light where it is not needed, and where it is, by designing lighting to mitigate harm, through shading, height of fixings, beam orientation, LUX, colour temperature in Kelvin and the proposed hours of use. For example, downward pointing, shielded, operated on timer, and with a ‘warm white’ colour temperature of 2700-Kelvin maximum. The colour and design of lamp posts also needs care, we recommend pale green not grey lamp posts.

Do you support the following proposal for site 11?
Proposed widening and clearance of existing footway up to 1.8m wide and approximately 530m in length.
Yes
This will help users of the Ridgeway National Trail. Ideally the scheme should cater for on-road and off-road cyclists too.

Do you support the following proposal for site 12?
Proposed new yellow backed signage on approach to the railway bridge and repainting of existing Bradenham Road railway bridge abutments in white.

No

The Chilterns Conservation Board is concerned about the visual appearance of the proposals, and suggests deleting the yellow backing on the signs. No details are given on the colour or design of proposed bridge abutment painting. This needs a solution that is sympathetic to the rural AONB location, the Bradenham Valley is an exceptionally beautiful and sensitive place.

Site 13 – West Wycombe pedestrian refuge south of Bradenham Road railway bridge and residential properties, A4010 Bradenham Road, West Wycombe

• New pedestrian refuge island, high mast beacon and bollards
• Widening of footway and tactile paving
• Carriageway haunching and realignments

(Note that your consultation software is displaying the site 12 proposals for this question again, not site 13 proposals. I am responding here on the West Wycombe pedestrian refuge south of Bradenham Road railway bridge and residential properties, A4010 Bradenham Road, West Wycombe). While the Chilterns Conservation Board welcomes a pedestrian refuge island, this is not wide enough for cyclists and horse riders as well as walkers, and if it requires high mast beacon and bollards we do not consider it worthwhile as it is not sympathetic to the rural AONB location.

Do you support the following proposal for site 14?

Question Title

* 18. Proposed repositioning of bus shelter and installation of additional hard standing area for pedestrians with associated civils works.

No objection to moving the existing bus shelter backwards, but consider that the new hard standing and headwall will be urbanising features in the AONB. The Bradenham Valley is an exceptionally beautiful and sensitive place. The Council has a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to conserving and enhancing the natural beauty of the Chilterns AONB. The Chilterns Conservation Board worked with our County Councils, including Bucks CC, to jointly develop advice in a document "Environmental Guidelines for the Management of Highways in the Chilterns", available online here https://www.chilternsaonb.org/uploads/files/ConservationBoard/Environmental_Guidelines_Highways.pdf

19. Notice is hereby given pursuant to Section 23 of the Road Traffic Regulation Act 1984. The Council will notify the appropriate Chief Officer of Thames Valley Police of this intention to install a new zebra crossing together with high friction surfacing and associated footway works, signing and road marking required at this location as part of the consultation.

Also, a proposed installation of new traffic islands either side of B4444 Station Road junction

Yes

Site 16 – Cressex pedestrian refuge between Fernie Fields and Havenfield Road, A4010 New Road, High Wycombe
Do you support the following proposal for site 17a?

**Site 17a – Saunderton (North) New Entry Features**

- Proposed installation of a new pedestrian refuge and associated footway works, including additional signage and road markings on approach to hill descent.

**Yes**

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Do you support the following proposal for site 17b?

**Site 17b – Saunderton (South) New Entry Features**

- No, Ditto

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Site 18 – Bradenham Wood Lane Junction with A4010, refreshed signs and lining, A4010 Bradenham Road

- Proposed refreshing of road signs and road marking on approach to the junction

No. Question 23 does not ask for views about new solar powered LED road studs through the junction, as shown in the Consultation Plans document. The Chilterns Conservation Board has no objection to the refreshing of road markings and trimming of vegetation around the base of the sign, but does object to the solar powered LED road studs. These should be deleted from the proposal. The LED studs are unnecessary and will cause light pollution. The new Chilterns AONB Management Plan 2019-24
contains a new policy DP8 on lighting: “Keep skies dark at night by only using light where and when needed. All new lighting should be the minimum required and meet or exceed guidance for intrinsically dark zones.”

<table>
<thead>
<tr>
<th>Great and Little Kimble Neighbourhood Plan Pre-submission</th>
<th>G&amp;LKC Parish Council</th>
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<tbody>
<tr>
<td>1. Section 2. Neighbourhood plans are a chance to recognise and protect features that are important or distinctive in a parish. Your neighbourhood area contains natural and historic environment assets which are rare, nationally and even internationally important, but this does not come through clearly in your plan. This is no ordinary parish and the plan should explain this.</td>
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<td>2. The description of the neighbourhood area currently has no section on landscape, only land use. We suggest the following addition before the land use section: “Landscape The south eastern third of the neighbourhood area falls within the Chilterns Area of Outstanding Natural Beauty (AONB), nationally designated as one of the country’s finest landscapes, and much of the area that is not designated AONB forms part of the setting of the Chilterns AONB. The panoramic views over the parish from the top of the escarpment (especially from Beacon Hill, Coombe Hill and Whiteleaf) and the views to the dramatic iconic chalk landform of Beacon Hill from the villages makes this a special and remarkable area of which the parish is justly proud. Beacon Hill is one of the most dramatic and easily recognisable landmarks in the Chilterns.”</td>
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<td>Para 2.2 mentions nature reserves but this could be expanded into a separate section on biodiversity. We suggest: “Biodiversity The parish is rich in biodiversity and contains habitats identified as of international value (Special Area of Conservation) and national value (SSSIs and ancient woodland), local wildlife sites and biodiversity opportunity areas. The parish contains the largest native box woodland in the country. The southern area of the Parish falls within the Chiltern Beechwoods Special Area of Conservation, an internationally important biodiversity designation. Any developments that could have an adverse effect on a Special Area of Conservation will require a Habitat Regulations Assessment. An initial screening stage would be required, followed by an Appropriate Assessment.”</td>
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<td>2. Para 2.8 describes the Ridgeway as skirting the north of the parish, this should be corrected to the south of the parish. It could be referred to as a National Trail, rather than a national long-distance path. It is one of only 15 national trails in England and Wales. A map of Public Rights of Way would be a good addition to the plan.</td>
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<tr>
<td>3. Para 2.11 is too brief on the historic assets of the Parish. It should list the Scheduled Ancient Monuments in the parish, including Cymbeline’s Castle, and refer to the Chequer’s Registered Park and Garden. More description could be added on the parish, for example that it is a long, narrow strip parish so classic of the northern scarp of the Chilterns. That Pulpit Hill has a prehistoric hillfort at its summit, that there was a Roman villa at Little Kimble, and a Norman motte and bailey castle at Little Kimble</td>
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which later became a moated medieval house. That an act of rebellion in the parish in the seventeenth century was one of the incidents that sparked the English Civil War. And that Chequers has been the official country residence for every British Prime Minister since 1921.

4. Section 3 of the neighbourhood plan addresses Planning Policy Context for the neighbourhood plan. Para 3.2 should refer to the section of the NPPF on Areas of Outstanding Natural Beauty (para 172). Para 3.6 should refer to local plan policy DM30 The Chilterns Area of Outstanding Natural Beauty.

5. Para 5.1 Vision please correct Chiltern AONB to Chilterns AONB. Why only refer to harm to the character of the Chilterns AONB? This could also say harm to the wildlife, habitats, tranquillity, dark skies and recreational enjoyment of the Chilterns AONB. Or character and local distinctiveness of the Chilterns AONB. Or character and special qualities of the Chilterns AONB.

6. Para 5.8 starts but does not finish a sentence: ‘the principle that development proposals adjoining as well as inside the existing villages…” (Will what?)

7. KIM2 please correct the name from ‘Chilterns Conservation Board Design Guidelines’ to ‘Chilterns Buildings Design Guide’.

8. KIM3. The Chilterns Conservation Board objects to all sites proposed for allocation which have not been assessed for their landscape and visual impact. You are lacking landscape sensitivity evidence for most of the shortlisted sites. This is a key part of the evidence base you will need for your plan at examination.

9. All five allocations are greenfield sites around the villages. They are all in the setting of the Chilterns AONB.

10. The scale of development proposed at 160 homes would be disproportionate to the small size of Little Kimble and Smokey Row.

11. KIM 3 allocations show a worrying lack of understanding about what the setting of the Chilterns AONB is. For example, page 20 reads “This site fronting on to Grove Lane lies outside the setting of the AONB”. The setting of the AONB is not a narrow geographic zone directly adjoining the AONB. Developments several miles from the AONB can affect the Chilterns AONB and be in its setting. The plan fails to understand that all the Kimble sites are in the setting of the Chilterns AONB. The degree of harm and acceptability will depend on multiple factors that need assessing, both visual and non-visual. Please see the Chilterns Conservation Board’s Position Statement on Development Affecting the Setting of the AONB. It explains how developments outside the AONB but in its setting can affect the AONB.

12. The new Chilterns AONB Management Plan 2019-2024 contains the following policy DP4 and supporting text on the setting of the AONB:

“Policy DP4
In the setting of the AONB, take full account of whether proposals harm the AONB. For example, development of land visible in panoramic views from the Chilterns escarpment, or which generates traffic in or travelling across the AONB, or
which increases water abstraction from the chalk aquifer, thereby reducing flow in chalk streams.
A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority’s legal duty towards the AONB applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). We have produced special advice in a Position Statement on Development Affecting the Setting of the AONB. The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary. Tall structures like chimneys that break the skyline or large growth proposals even far away can have an impact on the AONB, and so fall within the setting. Adverse impacts are not only visual, a noisy development may impact adversely on the tranquility of the AONB even if not visible from the AONB. We consider that the setting of the Chilterns AONB is the area within which development and land management proposals (by virtue of their nature, size, scale, siting, materials or design) may have an impact, either positive or negative, on the natural beauty and special qualities of the area."

13. The sites in KIM3 are all likely to be visible from the escarpment, generate traffic travelling across the AONB and increase water abstraction from the chalk aquifer.

14. AONB Management Plan policies should be taken into account in Local Plans and any neighbourhood plans in these areas, as instructed by the NPPG https://www.gov.uk/guidance/natural-environment see Paragraph: 004 Reference ID: 8-004-20140306.

15. The site that the Kimble Area Landscape Sensitivity & Capacity Study (WDC Sept 2017) identified as having the highest capacity for development in landscape terms (site 5 in that study), and the only one with high capacity, is not allocated. The only ones in both the WDC study and the consultation are site 17a and 14 (which were scored as medium capacity for development in landscape terms). Three of the sites have no landscape evidence base: sites 1, 15 and 10. They have not been tested so do not comply with the RUR6 requirement to accommodate development without having a major impact on the setting of the Chilterns AONB. Sites should only be taken forward where Landscape Capacity Assessment finds the sites acceptable. Landscape capacity assessment is likely to mean that some of your consultation sites are unacceptable, others could only accommodate development on part of the site and a reduced development area should be identified.

16. By way of example, Dacorum Borough Council proposed an allocation in the AONB west of Tring, to which Chilterns Conservation Board objected at Examination. The Planning Inspector concluded: “I have reflected on what I heard at the hearing sessions where this site was discussed, as well as the submitted written evidence. On the basis of this verbal and written evidence I have serious concerns that the gypsy and traveller site element of site LA5 is unsound. This is because of the lack of a formal assessment by the Council to assess its likely impact on the Chilterns Area of Outstanding Natural Beauty (AONB) and in particular whether it would conserve and enhance the natural beauty of the AONB… In conclusion, for the Plan to be found sound the Council will need to, as a minimum, advance main
modifications to remove reference to the provision of a gypsy and traveller site as part of LA5”. The proposed allocation in the AONB was subsequently deleted from the plan.

17. Where there are strong views from the AONB towards sites which are currently open and developed, particularly where these views are from popular panoramic public viewpoints on the Chilterns escarpment e.g. Beacon Hill, Coombe Hill, Whiteleaf, or on the Ridgeway National Trail, these sites should not be taken forward for development. Sites 1, 14, 15 and 17a have characteristics that raise concerns about views from the AONB and need further detailed landscape assessment.

18. Equally where development would damage views to the AONB, particularly views from public footpaths (like the Aylesbury Ring) towards the Chilterns escarpment, by blocking or interfering with open views to the hills, sites should be discounted.

19. For example, the photo (supplied) shows how development on the north side of Chinnor has damaged the setting of the AONB because it has harmed the view towards the escarpment. The edge of Chinnor is now very visible from the Thame Road and the Emmington Road and the public footpaths in between. The development is particularly visible because of the alignment of the houses tightly packed in a row parallel to the escarpment, and the lack of screening planting. Sites 1, 15 and 17a in the Kimble plan in particular have some characteristics in common with this landscape mistake.

20. Site 10 appears to be the least harmful to the AONB, but this needs proper landscape assessment by a qualified landscape practitioner as part of your evidence base.

21. The proposed MUGA on site 14 raises concerns about flood lighting and high fencing, neither of which would be acceptable in day and night-time views from the AONB. The policy should specify no floodlighting to protect the dark skies of the Chilterns AONB, an intrinsically dark zone. We would welcome other policies in the neighbourhood plan about preventing and reducing light pollution from households, businesses, street lights, community facilities and the railway. This could be included within Policies KIM6 and KIM7.

22. The suggested layouts on pages 31 to 35 do not appear to have been rooted in a landscape-led approach, and instead appear to be about filling up the shape of the plots. This results in some poor planning e.g. backland development and ribbon development, breaching principles of good planning and unacceptable in terms of conserving and enhancing the Chilterns AONB.

23. KIM5 landscape buffer is supported. This will help protect part of the setting of the Chilterns AONB from urban encroachment. We suggest that the arable land between Grove Lane and the Station should also be designated as a landscape buffer as this land is outside the AONB and very sensitive in views to and from the AONB. This would help ensure that Smokey Row and Little Kimble retain their separation.

24. KIM8 protecting international habitats is supported in principle, but it is deferring consideration of the effects of development
proposals until the planning application stage. This is undesirable because it is harder to assess cumulative effects at that stage, it should be addressed at plan-making stage.

25. There is no standalone policy on the Chilterns AONB. Suggest adding a Policy KIM9 and using the Chilterns AONB model planning policy (see box overleaf, plus advice on our neighbourhood planning webpage).

26. Some of the maps and plans in the neighbourhood plan are not orientated north, which is confusing (e.g. pages 29, 31, 32, 33, 34 and 35). Suggest orient all maps and plans north and add a north arrow.

Comments on the Sustainability Appraisal
27. The SA does not correctly address or assess the setting of the Chilterns AONB.

28. The SA Objective on Landscape and the Historic Environment (page 13) should refer to the Chilterns AONB and the setting of the AONB

Amend by adding text in bold:
"Protect and enhance the character and quality of landscapes and townscapes."– this seems quite generic and not strong enough for a landscape of this status (the nationally protected landscape of the Chilterns AONB)

Will the option/proposal help to:
• Conserve and enhance the nationally protected of the Chilterns AONB and its setting?
• Support landscape character reflecting the sensitivities of the two local character areas covering the Neighbourhood Plan area (NCA Profile 108: Upper Thames Clay Vales (NE570) and NCA Profile 110: Chilterns (NE406))? 

29. The SA is not therefore meeting the Parish Council’s statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of Countryside and Rights of Way Act 2000). The SA fails to be shaped by the WDC RUR6 policy "Accommodate development without having a major impact of the setting of Chilterns Area of Outstanding Natural Beauty (AONB)". The emerging plan, particularly the KIM3 allocations, should be tested in the SA against whether it has a major impact on the setting of the Chilterns AONB.

30. For example, Site 1 is described in the SA in relation to landscape character as follows “the site is not within the direct setting of the Chilterns AONB, which is located c.175m east of the site.” This shows a misunderstanding of AONB setting. It is not a narrow geographic zone that can be mapped. Ditto other sites which repeat the same statement e.g. site 15 “In relation to landscape character, the site is not within the direct setting of the Chilterns AONB, which, whilst less than 50m east of the site, is screened by the railway corridor and road.” The SA appears to be describing whether the site is in the AONB, and failing to understand that all the Kimble sites are in the setting of the Chilterns AONB. The degree of harm will depend on factors including visual intervisibility with the AONB, whether it blocks
<table>
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<th>views to the AONB, or views from the AONB, breaks wildlife corridors, causes light pollution, harms tranquillity etc. Impacts that affect the AONB can be visual or non-visual. Please see the Chilterns Conservation Board’s Position Statement on Development Affecting the Setting of the AONB. It explains what the setting is and what to look for in assessing whether development in the setting of the AONB will adversely affect the AONB.</th>
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<tr>
<td>31. Given the flawed approach to the setting of the AONB in the SA, the Chilterns Conservation Board disagrees strongly with the conclusions in the SA’s Landscape and Historic Environment section (page 51) about the effects of the neighbourhood plan. We do not agree that “Residual neutral effects are predicted overall against this SA theme.”</td>
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<td>32. The SA fails to cover cumulative effects, for example looking at the allocated sites together rather than individually. The total could be different from the sum of its parts. For example the view from Whiteleaf, Beacon Hill or Coombe Hill could be harmed by experiencing views of development on multiple sites across the parish, changing its overall loose knit character and its appearance of small places set in open green fields. The SA also fails to consider cumulative effects on the Chilterns AONB of the Kimbles’ growth plus other nearby planned development such as the expansion of Princes Risborough and Aylesbury, and the construction of HS2. The Chilterns Conservation Board has advice in our Position statement on Cumulative Impacts of Development on the Chilterns AONB.</td>
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<tr>
<td>33. Please engage further with the Chilterns Conservation Board as we are the statutory body for the Chilterns AONB. We wish to stay involved and assist in the future with plan proposals as they develop.</td>
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<tr>
<th>Heathrow West: Your Choice for New Terminal consultation</th>
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<tbody>
<tr>
<td>Heathrow West Ltd</td>
</tr>
<tr>
<td>1. The Chilterns Area of Outstanding Natural Beauty is nationally protected as one of the finest areas of countryside in the UK. The Chilterns Conservation Board is concerned that the impact on the Chilterns AONB has not be identified or considered anywhere in the consultation document.</td>
</tr>
<tr>
<td>2. As a protected landscape, with equal planning status to National Parks, great weight should be given to conserving landscape and scenic beauty of AONBs (set out in the Government’s National Planning Policy Framework para 172. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of Countryside and Rights of Way Act 2000).</td>
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<tr>
<td>Although the Heathrow West proposals are not within the Chilterns AONB, they are geographically close. Heathrow airport expansion will affect the AONB, and so falls within the setting of the AONB, because of:</td>
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<tr>
<td>• Increased noise and reduced tranquillity from more aircraft overflying the Chilterns AONB.</td>
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<tr>
<td>• Increased air pollution from surface traffic and aircraft, with effects on sensitive habitats in the Chilterns including protected sites of national and international importance such as the three Special Area of Conservation: Chiltern Beechwoods SAC, Aston Rowant SAC and Hartslock SAC.</td>
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</table>

25.6.19
- Cumulative impacts from the combined changes in flightpaths from Luton and Heathrow - it is important that in any redesign of flightpaths there is careful design to avoid harm to the tranquillity of the AONB, and take all opportunities to reduce noise over the AONB (e.g. eliminating the Bovingdon stack).
- People walking, cycling, riding or volunteering in the AONB are likely to be outdoors and seeking tranquillity, so are sensitive to noise disturbance and the sight of aircraft flying overhead.
- Negative impacts on wider green corridors that are connect with the Chilterns AONB, particularly the Colne Valley Regional Park.
- Increased water use from the expanded airport with potential impact on flow of chalk streams which are already failing standards because of over-abstraction of the chalk aquifer.
- The proposal to divert and culvert watercourses including chalk streams would harm wildlife and sever ecological connectivity. It would not allow these watercourses to take their natural course or undergo natural processes.
- Watercourse netting proposals are not consistent with conservation of wild bird populations.

4. We are concerned about the climate change implications of the proposal, and its inconsistency with the priority of addressing climate change.

5. The separation of the Heathrow West proposals from the northwest runway proposals is a serious concern. It makes assessment of environmental effects in the Environmental Statement artificially constrained and likely to fail to assess cumulative effects adequately. The impacts on the Chilterns AONB raised in our paragraph 3 above must be assessed seamlessly and holistically.

6. The statutory Chilterns AONB Management Plan 2019-2024 policies relevant to this proposal include DP1, DP2, DP4, DP10 and DP14.

7. The project should only go ahead if it achieves Environmental Net Gain, in the light of the Government’s 25 Year Environment Plan and the Draft Environmental (Principles and Governance) Bill.

8. The scope of the cumulative effects assessment should consider a wide area. It should include parts of the Chilterns AONB, where for example, increased traffic along the M40 and M25 which cut through the AONB could have an effect on air quality, noise and habitats. Other major projects like HS2 and the Ox-Cam expressway and growth corridor are all putting pressure on the Chilterns AONB and should be scoped into the assessment of cumulative effects.

9. The Chilterns Beechwood Special Area of Conservation and the Aston Rowant Special Area of Conservation are both close to motorways and major roads likely to experience increased traffic from the expansion of Heathrow. Air pollution and effects on sensitive habitats and protected sites of national and international importance must be carefully addressed through Environmental Impact Assessment and Habitat Regulations Assessment. All SACs
in the Chilterns AONB have already breached their critical loads for air pollution. For example, see http://publications.naturalengland.org.uk/publication/4808896162037760 from Natural England, Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018: "The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

10. Impacts on Chilterns chalk streams should be assessed, with careful scrutiny of where additional water supply for the Western Hub will come from. Chalk streams are an internationally rare habitat that are suffering from over-abstraction which is decreasing water levels in the streams and shortening their functional length.

11. Going forward the Chilterns Conservation Board would like to be involved as stakeholders and consultees in the Heathrow West work please, in order to advise on whether the plans conserve and enhance the Chilterns AONB, to ensure the impacts on the Chilterns AONB are properly assessed, avoided and reduced, and to ensure that the EIA and HRA include consideration of the Chilterns AONB. We will also seek to identify opportunities for AONB mitigation and enhancement in line with Chilterns AONB Management Plan policies DP10 and DP4.
### APPENDIX 6

**Current Development Plan Consultations:**

<table>
<thead>
<tr>
<th>Consultation document</th>
<th>Consulted by</th>
<th>Stage</th>
<th>Deadline for CCB responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chiltern and South Bucks Local Plan</td>
<td>C&amp;SB</td>
<td>Draft Chiltern and South Bucks 2036</td>
<td>19.7.19</td>
</tr>
<tr>
<td>Princes Risborough expansion SPD</td>
<td>WDC</td>
<td>Draft SPD</td>
<td>21.7.19</td>
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<tr>
<td>Luton Affordable Housing SPD</td>
<td>LBC</td>
<td>Draft SPD</td>
<td>22.7.19</td>
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<tr>
<td>Heathrow Airport Expansion</td>
<td>Heathrow Airport</td>
<td>Statutory consultation on expansion</td>
<td>13.9.19</td>
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</tbody>
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**Item 13**  
**Date of Next and Future Meetings**

**Lead:** Chair of Planning Committee

**Purpose or report:** To set the date of next and future meetings