



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 7<sup>th</sup> March 2018**

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

**Agenda**

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|--|---------------|
| 1. Apologies   | 10.00 – 10.01 |
| 2. Declarations of Interest                            | 10.01 – 10.02 |
| 3. Minutes of Previous Meeting                         | 10.02 – 10.10 |
| 4. Matters Arising                                     | 10.10 – 10.20 |
| 5. Public Question Time                                | 10.20 – 10.30 |
| 6. Update on Chilterns AONB debate in House of Commons | 10.30 – 10.35 |
| 7. Development Plans responses – update                | 10.35 – 10.45 |
| 8. Planning Applications – update                      | 10.45 – 10.55 |
| 9. AONB Management Plan workshop on planning section   | 10.55 – 12.20 |
| 10. Any urgent business                                | 12.20 – 12.25 |
| 11. Date of Next and Future Meetings                   | 12.25 – 12.30 |

**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 22<sup>nd</sup> November 2017 are attached (at Appendix 1) for approval.

**Recommendation**

1. **That the Committee approves the minutes of its meeting which took place on 22<sup>nd</sup> November 2017.**

**Appendix 1**

**MINUTES OF THE MEETING OF THE PLANNING COMMITTEE HELD ON Thursday  
22<sup>nd</sup> November 2017 at THE CHILTERN CONSERVATION BOARD OFFICE, 90  
STATION ROAD, CHINNOR, OX39 4HA COMMENCING AT 10.00 AM**

**BOARD MEMBERS PRESENT**

<b>Member</b>	<b>Appointing Body</b>
<b>Appointed by Local Authorities</b>	
Cllr David Barnard	North Herts District Council
Cllr Heather Kenison	Three Rivers District Council
Cllr Lynn Lloyd	South Oxfordshire District Council
Cllr Nick Rose	Chiltern District Council

<b>Appointed by the Secretary of State</b>	
Colin Courtney	Secretary of State
Helen Tuffs	Secretary of State
Elizabeth Wilson	Secretary of State- Chair

<b>Elected by Parish Councils</b>	
Cllr Alison Balfour-Lynn	Hertfordshire
Cllr Sue Biggs	Oxfordshire

<b>Officers present-</b>	
Lucy Murfett	CCB Planning Officer
Mike Stubbs	CCB Planning Advisor

<b>And others</b>	
Deirdre Hansen	Minute taker
John Nicholls	Board Member, observing

**311. Apologies for absence**

Apologies were received and accepted from Chris Hannington, Co-opted member.

**312. Declarations of Interest**

- Cllr Sue Biggs declared an interest in item 320 planning application APP/Q3115/W/16/3165351 as a member of the group examining this application.

- Colin Courtney declared an interest in item 320 planning applications App/K0425/W/16/3149747 and CC/01/17 in Princes Risborough as a resident of Princes Risborough and comments submitted on the planning applications.

### **313. Minutes of the previous meeting**

The minutes of the meeting held 20<sup>th</sup> July 2017 were approved as a true record and signed by the Chair after the following amendments were made:

- Item 300. Last paragraph “*the Committee had...*” to” was changed to “the”
- Item 304. Second recommendation “noted” was added after “and”
- Item 306. Second last sentence: “to” was changed to “should”.

### **314. Matters Arising from the minutes**

A question was asked about rumoured development at M40 J7. The emerging South Oxfordshire Local Plan does not include this as an allocation.

### **315. Public Question time**

No members of the public were present.

*10.15 David Barnard arrived.*

### **316. New Position Statement on Cumulative Impact of Development.**

The Planning Officer thanked the Chair for her help on this Position Statement. The Position Statement was published Wednesday 15<sup>th</sup> November accompanied by a press release. The Position Statement is available on the CCB’s web site:

<http://www.chilternsaonb.org/conservation-board/planning-development/positionstatements.html>

The Position Statement will now be sent out to the Local Authorities, it was suggested that it might be suitable for a wider circulation using a variety of distribution methods. Members were asked to promote the Position Statement.

The Position Statement is a material position for the forthcoming Management Plan. It was agreed to review the take-up of this Position Statement next year.

The Committee discussed the development pressures the Local Authorities are under and the duty to have regard for the AONB.

The Planning Officer showed the Committee a map of the AONB showing areas of development pressure. A volunteer has been found to regularly update the map with new proposals. The map not only illustrates the issues being faced, but will provide a useful tool for all Local Authorities. It is intended that eventually the map will be interactive and available online.

The Planning Officer was thanked for her work on the Position Statement and the map.

- 1. The Committee WELCOMES the update and Members AGREED to take opportunities to promote the Position Statement.**

- 2. The Committee AGREED that the Planning Officer circulate the Position Statement to LPAs and other stakeholders.**
- 3. The Committee AGREED to review the utility of the Position Statement next summer.**

### **317. Independent Review of Housing in England's AONBs.**

The Planning Officer made the Committee aware of the Review of Housing in England's AONBs by the CPRE and the National Association of AONBs published 15<sup>th</sup> November.

The Review only looked at large developments of 10 or more houses.

It shows that the perceived housing pressure is real, there is an 82% increase in houses approved in the last 5 years. 79% of the housing pressure is concentrated in 8 AONB's in the South East and South West.

Members were encouraged to look at and refer people to "An Independent Review of Housing in England's AONBs 2012-2017", the report makes a number of useful recommendations. The Committee discussed the review and agreed to promote this research. It was noted that the CPRE has produced a summary report called "Beauty Betrayed". The Committee were reminded of the CCB's proud history of helping and supporting appropriate development in the AONB, reinforcing its special qualities.

- 1. The Committee WELCOMED the report.**
- 2. The Committee AGREED that the CCB, with the NAAONB and other AONBs, should promote the findings locally and nationally.**
- 3. The Committee AGREED that the conclusions of the Review are input into the work on the new Chilterns AONB Management Plan.**

### **318. AONB Management Plan Review development section.**

The Planning Officer introduced the start of the work on the AONB Management Plan Review and the approach that could be taken.

She asked for the Committee's assistance with the work, each chapter will have a lead officer and the Local Authorities will soon be informed that the process has started.

The Committee discussed the approach and agreed that the existing planning groupings should be used, although the process still needs to be resolved. The Planning Forum workshop in February 2018 will provide a good opportunity for discussion and a report can be brought to the Planning Committee in March, with a draft development section to follow in the spring 2018.

- 1. The Committee NOTED the update and provided feedback on the best approach to reviewing the development section of the Chilterns AONB Management Plan Review.**

### 319. Development Plan Responses

The Planning Officer informed the Committee that she had submitted responses on 9 development plan documents and 3 government/ infrastructure consultations.

She gave brief comments on the submissions made. In particular she welcomed the South and Vale Green Infrastructure Strategy and the sight of a good neighbourhood plan vs some lesser ones.

She was commended on her full responses and thanked for her work.

- 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.**

### 320. Planning Applications Update

The Planning Officer informed the Committee about, and sought approval for, the 23 responses that have been made by the Planning Advisor under delegated powers in connection with Planning Applications and one written appeal representation as detailed in the agenda.

*12.12 David Barnard left the meeting.*

The responses were discussed and particular note was made of:

- a. CH/2016/2407/FA Hazeldene Farm, Ashridge this had been refused and has now gone to appeal.
- b. CH/2017/1648/FA OS parcel 2814 opposite Tiles Farm, Ashridge. This has been refused and is going to appeal. A stop notice has been put on the site.

*12.15 Nick Rose left the meeting.*

- c. P16/S3630/0 Peppard Road and Kiln Road. There will be a public inquiry to hear this appeal.
- d. App/K0425/W/16/3149747 CABI Wallingford. The Inspector found that this site did not contain AONB special qualities and the commercial benefit would outweigh the harm. Concern was raised on this and the low proportion of affordable houses included in the development.
- e. APP/K0425/W/15/313529, Molins Saunderton here the Inspector and the Secretary of State were in agreement that the scheme would seriously harm the sensitive character and appearance of the countryside and the special qualities of the AONB.
- f. APP/K0425/W/16/3149747 Former Molins Sports Ground, Princes Risborough. Here the appeal was dismissed on Green Belt grounds, the harm to the AONB was not a determinative issue.
- g. APP/J0405/W/16/3158833 land north of Aylesbury Road, Wendover. Here on dismissal the Inspector had taken a holistic view of the whole landscape even though the site is not in the AONB or abutting it. It has been considered as a valued landscape.
- h. The Committee discussed “setting” and noted that it is a sensitive issue.

The Planning Advisor was thanked for all his work on Planning Applications.

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

**321. Urgent Business**

- a. The Committee touched on resource issues
- b. The Planning Officer advised the Committee that she had been informed by Natural England that, due to insufficient resources, they would no longer comment on planning applications for major developments in the AONB in Oxon and Bucks, but would send a standard response referring to the CCB, even though Natural England are a statutory consultee. An implication for CCB resource issues was noted.

**310. Date of the next meeting Wednesday 7<sup>th</sup> March 2018 at CCB offices at 10.00 am.**

**Future dates: Wednesday 18<sup>th</sup> July and 21<sup>st</sup> November 2018.**

**The Chair.....**

**Date.....**

**Item 6      Update on Chilterns AONB debate in House of Commons**

<b>Author:</b>	Lucy Murfett Planning Officer
<b>Lead Organisations:</b>	Chilterns Conservation Board
<b>Resources:</b>	Staff time
<b>Summary:</b>	The planning pressures in the Chilterns AONB have been debated in the House of Commons.
<b>Purpose of report:</b>	To update the Committee

**Background**

1. Following a meeting with Sue Holden and the publication of the research report [\*An Independent Review of Housing in England's Areas of Outstanding Natural Beauty 2012-2017\*](#), discussed under Item 7 of the Planning Committee of 22<sup>nd</sup> November 2017, the issue of housing and infrastructure pressures in the Chilterns AONB was raised in Parliament by Cheryl Gillan MP.
2. The full text of the adjournment debate is available at <http://hansard.parliament.uk/Commons/2018-01-09/debates/b926cffe-b62e-4a7a-993a-05f07df2e918/CommonsChamber> and a video is available to watch here <http://parliamentlive.tv/event/index/386e7da4-66e3-4bd1-ade3-ce958610c414> (scroll to 19:37 in the agenda).
3. The response the Ministry of Housing, Communities and Local Government was as follows:

"Areas of outstanding natural beauty have the highest status of environmental protection in the national planning policy framework, which states: "Great weight should be given to conserving landscape and scenic beauty". In the year to March 2016, only 0.2 per cent of the Chilterns AONB was given to residential buildings. I can confirm that the Government are committed to retaining this protection, and it will not be weakened through our planning reforms. The interpretation of the NPPF protection for AONBs is in the first instance for the local authority to determine and thereafter, if relevant, for the planning inspector."
4. Shortly afterwards the issue was raised in Prime Minister's Question on 11<sup>th</sup> January 2018:

Cheryl Gillian MP: "Could the Prime Minister confirm her commitment to protecting the Chilterns AONB as we pursue the Government's economic and housing development plans?"



Prime Minister: “I assure her that we are committed to maintaining the strongest protections for AONBs and other designated landscapes. As regards the Chilterns AONB, I have to say to her that I enjoy walking in the Chilterns. I recognise the value of that particular environment, and we are committed to protecting AONBs.”

5. These responses provide useful reassurances to the local authorities covering the Chilterns on national policy protection and policy direction.
6. The Government’s 25 Year Environment Plan, published in January and available at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf) reaffirms that “While development is not prohibited in National Parks or AONBs, major development should take place only in exceptional circumstances.” It contains a commitment to a 21<sup>st</sup> Century “Hobhouse Review” of National Parks and AONBs which will “consider coverage of designations, how designated areas deliver their responsibilities, how designated areas are financed and whether there is scope for expansion”.
7. A consultation on amendments to the National Planning Policy Framework is expected on Monday 5<sup>th</sup> March.

### **Recommendation**

1. **That the Committee notes the update.**

**Item 7**                      **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 representations have been submitted on 11 development plan documents and 1 infrastructure consultation.

**Purpose of report:** To update the Committee about representations on development plan documents and other consultations.

**Recommendation**

1. **That the Committee approves the responses sent in Appendix 2, notes the current consultations on development plans listed in Appendix 3 and provides comments to the Planning Officer as appropriate.**

**APPENDIX 2****CCB Responses on Development Plan Consultations:**

Consultation document	Consulted by	Summary of the Board's Response (please contact the Board for more detailed information if this is required)	CCB response date
Wycombe Local Plan Reg 19 publication	WDC	<p><b>Para 1.10</b> Given that the District is heavily constrained by natural and historic environment designations as well as the Green Belt, it is important and highly relevant to reference the footnote in the NPPF which sets out where the presumption does not apply, including in the AONB and Green Belt:</p> <p><b>Para 3.7 and Policy CP1</b> CCB welcomes and supports the number one strategic objective being 'Cherish the Chilterns'. However, the objective is not effective if it is not carried through in the plan proposals. CCB questions the statement that "The Plan delivers the vision and objectives". The plan need to do more to deliver on this, by: 1) deleting proposals for major development in the AONB and 2) identifying as an infrastructure delivery theme funding for enhancing the natural beauty of the Chilterns and people's access to it.</p> <p><b>CP2 Overall Spatial Strategy</b> Support the protection of areas where development should be restricted, but for consistency with national policy in NPPF para 115 and 116 bullet (a)(i) should apply not just to allocations but also speculative applications. The policies of the plan includes policies which will apply to planning applications. The strategy of "not allocating sites that constitute 'major development' in the AONB" is not met by the plan. The plan allocates sites at Stokenchurch and a major road south west of Princes Risborough which are likely to be major development, and commits the Kimble neighbourhood plan to a level of housing that is likely to harm the AONB and its setting.</p> <p><b>Maps</b> The AONB boundary is misleading and not shown clearly, settlements of Lane End, Stokenchurch, Walters Ash and Naphill appear inset from AONB when they are washed over. Figures 4, 6, 7, 8 as currently shown it appears that the AONB does not cover such places - clearly incorrect.</p> <p><b>CP4 Delivering Homes</b> CCB is concerned at the figure of 940 homes in the rural areas. Most of this area is in the Chilterns AONB. This quantity of development could materially harm the AONB. Even if individual sites are small (and there is no certainty that they will be), there will be a cumulative effect of new development. Policy CP4 will involve incremental change of many small sites across the rural areas and nibbling at edges of villages in the AONB, as well as substantial strategic-scale growth in the setting of the AONB. Other districts across the AONB are also planning housing in the AONB, these need to be looked at together to see the full picture and assess long term effects. On top of the 940 in the rural areas, planning 160 homes at Kimble is likely to harm the setting of the AONB</p>	24.11.17

	<p>Reduce the allocation to the rural area downwards from 940 homes in order to reduce the impact of incremental change and cumulative harm to the special qualities, habitats, tranquillity and character of the Chilterns AONB. Housing proposals in the AONB should invariably be small in scale and to meet identified local needs</p> <p><b>Policy HW6 Gomm Valley and Ashwells</b>          It is regrettable that the Gomm Valley was not included within the AONB when the boundary was reviewed in 1990. It remains of high landscape value, and any development must be sympathetic to this high quality and the role of the land in the setting of the Chilterns AONB. Development of the site appears to be at odds with the Buckinghamshire Green Infrastructure Delivery Plan (Aug 2013, and repeated in the Local Plan SA at page 78) in which the Gomm Valley is an identified part of the existing green infrastructure network. Development will undermine the role of the Gomm Valley as a wildlife corridor linking to the Chilterns Beechwoods SAC and Millfield Wood SSSI, and a green finger linking the AONB north of Wycombe through Terriers Farm, King's Wood, Gomm Valley and out to the AONB east of Wycombe. Applying the Lawton Principles (Making Space for Nature, DEFRA, 2010) would see more, bigger and better-joined up protected areas.          AONB setting should be identified as a key development principle in the placemaking part of the policy at either a) or b).          Residential parcel 2 should be deleted because it is visible from a key AONB viewpoint and is too near the chalk grassland SSSI which should have a wider buffer. This land would be better as a forest garden for the new primary school next door.          Greater priority to protecting and delivering a green corridor and ecological connectivity, including deleting parcels 7 and 8 and addressing severance by the existing and planned new roads.</p> <p><b>HW7 Terriers Farm and Terriers House</b>          As with other previously reserved sites, the Board does not object to this allocation in principle but the details need to be right. The site is immediately adjacent to the AONB and great care is needed with the treatment on the edges of the site. Views out of, and into, the AONB must be carefully treated and the implications arising from the development should be properly addressed.          Greater priority to protecting and delivering a green corridor and ecological connectivity. Reduce residential areas and address ecological severance to King's Wood caused by the existing A404 and the planned new estate roads.</p> <p><b>HW8 Land off Amersham Road Including Tralee Farm, Hazlemere</b>          The site is in the setting of the AONB and contains historically important habitat of significance to the AONB. The area of Traditional Orchard – a Priority Habitat on the site should be preserved and protected, not developed. There are also three area of Traditional Orchard in the adjacent Chiltern District Council proposed allocation. Traditional Orchard is a key focus for the Chalk, Cherries and Chairs Landscape Partnership Scheme, a current Heritage Lottery Funded project run from the Chilterns Conservation Board. This cherry orchard habitat should be restored and extended to contribute to the Chalk Cherries and Chairs project, there is good potential for net gain to be delivered here.          See <a href="http://www.chilternsaonb.org/about-chilterns/landscape-">http://www.chilternsaonb.org/about-chilterns/landscape-</a></p>	
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	<p>partnership-scheme.html. Research should be carried out on the history and culture of traditional orchards on this site using historical mapping and local history (see for example <a href="https://www.holmergreen.info/history">https://www.holmergreen.info/history</a>). Already orchard land has been lost near the site (evident in place names Orchard Way, Orchard Park). No more should be lost. The focus should be on joining up and restoring the orchards. The north eastern rectangular residential parcel should be reduced in size to allow a swathe of habitat restoration and connection with the parcel of traditional orchard next door on the site allocated in the emerging Chiltern Local Plan. This will provide a comprehensive approach to development and biodiversity net gains (NPPF para 109). On the illustrative layout, re-shape the north eastern rectangular residential parcel to allow a swathe of habitat restoration and connection with the parcel of traditional orchard next door on the site allocated in the emerging Chiltern Local Plan.</p> <p>Amend the policy text to read:</p> <p>3. a) Provide access to, <del>and</del> retain <b>and expand</b> the existing <b>traditional</b> orchard within the north east of the site, <b>connecting it to neighbouring area of priority habitat</b>;</p> <p><b>HW9 Part of Greens Farm, Glynswood, Green Hill, High Wycombe</b> Delete the allocation. This site is in the Chilterns AONB. It is in the sensitive historic landscape of the Hughenden Valley, adjacent to the National Trust estate and is visible from the Disreali monument. It functions successfully as a wildlife and landscape buffer between the northern edge of the built form of High Wycombe and the tranquil attractive dry valley belonging to the National Trust. Allocating this sensitive greenfield AONB site for 50 dwellings does not give great weight to the AONB (NPPF para 115) or demonstrate regard to conserving and enhancing the natural beauty of the AONB (Countryside and Rights of Way Act 2000 sec 85).</p> <p><b>HW11 Clay Lane, Booker</b> Residential development on this side of the M40 constitutes urban sprawl of High Wycombe beyond the clear physical barrier of the motorway. It sets an undesirable precedent likely to lead to further encroachment into the open countryside. References to residential densities that create a 'gateway' to Booker from the north are inappropriate. Assessment of the cumulative effects of HW11, HW16, HW17 and RUR11 on the Chilterns AONB and against SA objectives should be undertaken, and whether they constitute major development to which NPPF para 116 would apply. Delete residential use and consider for an alternative non-residential use. Remove concept of a gateway with associated appropriate densities, instead retain and enhance this site as part of the rural realm in the setting of the AONB</p> <p><b>HW16 Wycombe Air Park</b> The Airpark is inset from the Chilterns AONB and in the setting of the AONB. The policy text fails to recognise or refer to this. Employment uses, once removed from the Green Belt, could involve buildings of significant bulk and height. Paragraph 5.1.126 refers to proposals needing a landscape impact assessment, this should be corrected to Landscape and Visual Impact Assessment</p>	
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		<p><b>HW17 Land Adjoining High Heavens Household Recycling Centre</b></p> <p>Delete allocation, does not conserve and enhance AONB. This site is within the Chilterns AONB. Low density yard based uses are unlikely to conserve and enhance the natural beauty of the Chilterns AONB. Great weight should be given to this (NPPF para 115). The allocation offers nothing in the way of biodiversity or landscape character enhancements, or improving the experience for visitors or users of the rights of way network. Additional traffic is likely to be generated by new yards, as well as noise, air, water and light pollution. The expansion of development on the far side of the M40 from High Wycombe is undesirable, unsustainable and is likely to lead to pressure for other fields in the AONB south and east of Clay Lane to be developed. The proposals need to be assessed in conjunction with Bucks County Council's emerging allocation in the Minerals and Waste Local Plan. Assessment of the cumulative effects of HW11, HW16, HW17, RUR11 and the Bucks Minerals and Waste Local Plan proposals at High Heavens should be undertaken, assessing for impact on the Chilterns AONB, whether constitutes major development in the AONB (if so should be refused under NPPF para 116 unless tests are met), and against SA objectives.</p> <p><b>HW21 Land at Queensway, Hazlemere</b></p> <p>Refer to Chilterns AONB as well as Green Belt in the policy text. Insert requirements for proposals to conserve and enhance the AONB, and enhance ecological corridors. This site is in the Chilterns AONB. A cemetery use would only be appropriate if it conserve and enhances the AONB (NPPF para 115). A new cemetery is likely to involve buildings, car parking, formalised tree planting, paths, benches, headstones and plaques. A natural burial ground with a less formal character is likely to be more appropriate, and use of planting which links to wider ecological corridors including the woodland west of the A404 and the via the gold course to the important expanse of Chilterns ancient woodland at Penn and Common Woods</p> <p><b>MR6 Seymour Court Road</b></p> <p>Delete allocation. This site is in the Chilterns AONB. Although small and not major development, the Board objects to the proposed allocation. The site provides a successful transition between the north west residential urban edge of Marlow and the open AONB countryside beyond. There is a footpath through the site and impressive views from Seymour Court Road of rising hills with fields and mature tree belt hedgerows which would be likely to be blocked by development. Housing development on the site would constitute ribbon development. The draft allocation is already leading to pressure for adjacent land to be developed. Para 5.2.11 explains that this site lies within the Medmenham Biodiversity Opportunity Area (BOA), and goes on to state that "the BOA is not a constraint but an opportunity to improve and create new habitats." It is not clear how habitats could be improved or created on this small site while at the same time accommodating 9 dwellings and an access road.</p>	
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	<p><b>PR3 Princes Risborough Area of Comprehensive Development including Relief Road</b></p> <p>The main expansion area is within the setting of the Chilterns Area of Outstanding Natural Beauty (AONB). The housing number being proposed at Princes Risborough is large, the relief road proposals involves a new road through the AONB, a significant area of greenfield land is under pressure for development in the setting of the Chilterns AONB. Very careful consideration needs to be exercised with urban expansion below the scarp slope of the Chilterns. The views out of the AONB from key viewpoints e.g. from Whiteleaf Cross, Brush Hill Local Nature Reserve and along the Ridgeway National Trail, are some of the most important views in the Chilterns, central to the public's recreational enjoyment of the AONB. This is a nationally important place on a National Trail, which should be protected for current and future generations to enjoy.</p> <p>CCB understands the difficulty for Wycombe District Council in finding areas for strategic housing growth. This pressure has led the Council to make decisions which are harmful as shown in the evidence base and SA:</p> <ul style="list-style-type: none"> <li>• The Sustainability Appraisal of Reasonable Alternatives and Preferred Options for the Princes Risborough Town Plan (March 2016) by Lepus Consulting for Wycombe District Council, recognises at paras N9-10 that "In general options performed negatively with regards to biodiversity, landscape, cultural heritage, water, climate change mitigation, climate change adaptation and land resources. The larger scale of development for higher growth options may be more likely to lead to negative environmental effects, in particular on the setting of the nationally important Chilterns AONB." Option 1 (development of sites within the town's built-up area only with no greenfield expansion) had the highest number of positive performing sustainability objectives, leading Lepus Consulting to comment 'This suggests that it is the best performing option; and in this sense, it is.'</li> <li>• The quantum of housing proposed is likely to add to the volumes of traffic passing through the AONB which will erode its tranquillity, lead to noise and vibration and a reduction in air quality. The Habitats Assessment report identifies in relation to the Chiltern Beechwood Special Area of Conservation that "The main factors which could have harmful effect on all or some of these SACs are increased atmospheric pollution which may increase the susceptibility of the beech trees to disease, and poor management in the form of over grazing and human factors in the form of visitor pressure on the sites." (para 3.39)</li> <li>• The Council's draft Princes Risborough Town Plan: Landscape Sensitivity and Capacity Study (February 2016) identifies that "The expansion area is visible from the AONB and many parts have strong intervisibility with the Chiltern escarpment" (para 4.8). It goes on to conclude that "Any proposed expansion of this scale will inevitably adversely affect views from the Chilterns AONB" (para 5.8). CCB agrees with these conclusions.</li> </ul> <p>While accepting the Council's dilemma and the principle of the Princes Risborough expansion area, the Chilterns Conservation</p>	
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	<p>Board considers further changes are necessary to reduce the harm to the Chilterns AONB. These are:</p> <ol style="list-style-type: none"> <li>1. Deletion of the new road through the Chilterns AONB (see our response to PR8).</li> <li>2. Lower numbers to allow lower densities and the removal of three storey development. This would be more prominent in views from Whiteleaf (the greater impact that 3 storeys makes is apparent from a recent development in Princes Risborough). Building at higher density on the part of the development nearest the existing town means higher densities in the area most visible from the AONB, and allows less space for tree planting within the development. It also means higher development would block views from within the development area to the escarpment.</li> <li>3. Wider strategic buffer (see our response to PR5)</li> <li>4. There should be no development east of Mill Lane. This land is very visible from the AONB (see gigapan photograph below), the Board does not agree that long distance views of new development on Mill Lane from the AONB and Whiteleaf Cross could be mitigated with planting. Residential development here would be poor practice ribbon development. Sports pitches are unlikely to be a suitable use, the land should be enhanced as a green corridor connecting with Kingsmead Meadow LWS to the wider landscape. Sports pitches bring pressure for floodlighting, buildings, car parks, astroturf etc, which should all be avoided here. Sports facilities should be re-sited within the main development area.</li> <li>5. Add reference in the plan to the CCB's policy statement on Development Affecting the Setting of the Chilterns AONB, available here <a href="http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html">http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html</a>. This provides useful advice and guidance on avoiding and reducing harm which should be incorporated in the plan.</li> </ol> <p><b>PR5 Settlement boundary and strategic buffer</b></p> <p>Para 5.3.22 states that the extent of the expansion area is shaped by factors including avoiding coalescence with Longwick and the visual impact of the expansion from the AONB escarpment. But the Lower Icknield Way green buffer to Longwick as proposed (Figure 28 and the proposals map) is not wide enough to protect the visual impact from Whiteleaf. Viewed from the escarpment at height at Whiteleaf Cross or Brush Hill the buffer will be almost imperceptible. The buffer will be hidden behind built development and there is unlikely to be a visual break between Princes Risborough (as expanded) and Longwick. The preparation of a photomontage from Whiteleaf would assist with assessing the adequacy of the strategic buffer from the AONB. As it stands the policy is not effective. Provide a photomontage of the view from Whiteleaf to assist in assessing the adequacy of the strategic buffer from the AONB. Increase the width of the buffer until it fulfils the desired aim of avoiding coalescence with Longwick and addressing the visual impact of the town's expansion from the AONB escarpment.</p> <p><b>PR7 Development Requirements</b></p> <p>The development requirements should include contributions towards new and improved facilities for recreation in the Chilterns AONB and conservation land management of AONB visitor sites. The development will increase visitor numbers and add pressure like soil erosion, path maintenance, habitat management, dog</p>	
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	<p>disturbance, litter and anti-social behaviour. Add requirements to fund enhancements to visitor facilities, rights of way and habitat management at Whiteleaf and Brush Hill to accommodate without harm the increased town population using these already popular sites.</p> <p><b>PR8 Provision and safeguarding of transport infrastructure</b> Delete the new road in the AONB from the plan. Address any works in the AONB with a substantial AONB/ ecological mitigation package. The road is likely to constitute major development in the AONB, to which the tests in para 116 of the NPPF apply.</p> <p>The road proposal is inconsistent with the Local Plan’s Principles for Rural Areas (page 275) which states “avoid damaging works with the Area of Outstanding Natural Beauty to address the need for significant improvements to county-wide north-south connectivity”.</p> <p>The new road would be visible from the important viewpoint at Brush Hill nature reserve and the Ridgeway National Trail. Particularly given the road alignment and the orientation of the view, the new road would be appear as an elongated linear feature from Brush Hill, with a new roundabout which would potentially trigger the introduction of street lighting affecting the dark skies of the AONB. The introduction of motion (traffic passing) and lighting would be detrimental to the view, to tranquillity and to dark skies. The new road would also affect the Pyrtle Brook, a chalk-fed stream and a Priority Habitat (Chalk Headways), with a risk of polluted run-off from the new road. With no defensible boundary, in time the new road is likely to lead to pressure for further development in the field across which it passes.</p> <p>The Chilterns Conservation Board has discussed with the Council the potential for highways works to incorporate:</p> <ul style="list-style-type: none"> <li>i) habitat creation works, including the possibility of verges which encourage and provide stepping stones to assist two rare colonies of Duke of Burgundy butterflies that live nearby;</li> <li>ii) closing part of the Ridgeway National Trail along the Upper Icknield Way to vehicular traffic, this would be a modest but positive enhancement to the enjoyment of the AONB.</li> </ul> <p>Neither of these are identified to be delivered with the new road in the AONB. Measures have not been taken to avoid, reduce or mitigate harm to the nationally protected landscape</p> <p><b>PR11 Land to the Rear of Poppy Road</b> 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. The ecology of the site and surrounding, 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. In these circumstances it is not justified to include an allocation and</p>	
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	<p>park the issue of its ecological value until the planning application stage, as suggested by para 5.3.167.</p> <p><b>PR16 Land at Princes Risborough Station</b>          The station area policy is currently a missed opportunity to provide a gateway to the Chilterns AONB. There is a new Chiltern Rail link direct to Oxford as well as a regular service to London Marylebone, and a future improving service to Aylesbury. The Ridgeway National Trail and the Chilterns AONB are a short stroll from the station, making this a key access point on sustainable means of transport for day visitors and tourists. This potential is currently largely untapped, because of lack of facilities for visitors or signposting to the rights of way network in the Chilterns AONB. Add to station policy measures that boost the tourism and day visitor experience e.g. cycle hire, café, information centre and signage and interpretation about the many cycling and walking opportunity into the Chilterns AONB to make this station a real 'gateway to the Chilterns'. This could bring sustainable tourism and economic benefits as well as health and wellbeing. Over 10 million people live within 1 hour of the Chilterns AONB and there are 55 million leisure visits to it each year, with a spend of over £400 million a year. Rather than trying to locate housing developments here, the plan could harness jobs and opportunities in the rural visitor economy, and increase recreation and enjoyment.</p> <p><b>Principles for Rural Areas</b>          Principle 3a)          The Chilterns Conservation Board objects to applying the same approach to rural enterprise and diversification in the AONB as in non-designated countryside. This is contrary to national policy (NPPF para 115) and fails to demonstrate regard to conserving and enhancing the natural beauty of the AONB which the Council is required to do under the <a href="#">Countryside and Rights of Way Act 2000 section 85</a>          Suggest: a) Support rural enterprise and diversification <b>in the rural areas</b> <del>by allowing farms and business centres within the while applying relevant plan policies for</del> the Area of Outstanding Natural Beauty and/or Green Belt <del>to have similar opportunities to be flexible in the use of buildings as other parts of the rural areas.</del></p> <p><b>RUR1 Land South of Finings Road, Lane End</b>          This site is in the Chilterns AONB. CCB objects to the allocation. A housing development of 19 dwellings here 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. It 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. There is no defensible boundary to prevent pressure for 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. Site comprises attractive rural pasture land in the AONB. Lacks a boundary to prevent pressure for future development of the rest of field. Rural access and ancient woodland on eastern boundary of</p>	
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	<p>site. Note Bucks County Council comments 'would have to either improve visibility to meet Manual for Streets guidance, or not result in vehicular intensification'. A housing development would clearly result in vehicular intensification compared with the current use (livestock farming), and transport engineering to improve visibility would be likely to affect rural character by creating an alien and urbanising features. Delete allocation</p> <p><b>RUR2 Land between Chalky Field and Marlow Road, Lane End</b> This site is in the Chilterns AONB. The Chilterns Conservation Board objects to the allocation. A housing development here of 27 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. 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. Attractive grazed pastureland in AONB with undulating valley. Lack of defensible boundary could lead to pressure for future westwards expansion. Delete allocation.</p> <p><b>RUR4 Little Marlow Lakes Country Park</b> The supporting text explains at para 5.5.25 the requirement to reflect the open nature of the site and the views from the AONB, as well respecting and enhancing the Conservation Areas and enhancing biodiversity. There are panoramic views over the lakes from Winter Hill in the AONB. For consistency with the lower case text and effectiveness of the policy, the AONB should also be referred to in policy; it would slot well into bullet point 3. Amend text to: "4. Planning permission will not be granted for development within the country park that that has an adverse effect upon the amenities or setting of the River Thames, watercourses, lakes, wet woodlands, <b>the adjacent AONB</b>, adjoining conservation areas or Listed Buildings, or which prejudices the function of the area for the purposes of a country park."</p> <p><b>RUR6 Great and Little Kimble-cum-Marsh Parish</b> Great and Little Kimble cum Marsh Parish is partly in the Chilterns AONB and firmly in the setting of the AONB. This is a highly sensitive area, with magnificent close views to and from some of the most beautiful parts of the Chilterns chalk escarpment. It is visible from Beacon Hill and Coombe Hill, among the most visited and popular viewpoints in the AONB. This is rich historic environment, an ancient landscape with a remarkable concentration of historical sites: an iron age hillfort, a Roman villa, a Norman motte and bailey castle, and in the 19<sup>th</sup> Century a lace-making school of importance to the Buckinghamshire lacemaking industry. In close proximity is rare box woodland at Great Kimble Warren and Ellesborough, which is the largest area of native box woodland in the country, designated as of international importance as a Special Area of Conservation, as well as a cluster of sites of local and national importance (SSSIs, Local Wildlife Sites, Ancient Woodlands and a Biodiversity Opportunity Area). This is a parish of small villages and hamlets. It is not a location where strategic-scale</p>	
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	<p>growth is appropriate. Small-scale housing for local community needs would be the right policy approach eg rural exceptions sites, community land trusts, limited infill or redevelopment of brownfield sites. The purple line on the map above shows the AONB boundary, Great Kimble within the AONB. Little Kimble is partly in the AONB. Smokey Row is near the AONB and on some footpaths which are important strategic green infrastructure links between settlements and the AONB (the North Buckinghamshire Way/ Midshires Way and the Aylesbury Ring), the views from these paths towards the AONB should not become urbanised.</p> <p>It is not acceptable for the local plan to require a Parish Council to make allocations in a neighbourhood plan which are likely to harm the AONB, biodiversity and designated historic assets. A neighbourhood plan would not be in conformity with the Local Plan if it failed to do so, and yet a Parish Council is, like the District Council, subject to the duty towards the AONB in the Countryside and Rights of Way Act 2000 (Section 85). The policy wording seems to acknowledge this proposal will cause harm:</p> <p>“i. Accommodate development without having a <b>major</b> impact on the setting of the Chilterns Area of Outstanding Natural Beauty;” (emphasis added)</p> <p>The Council’s Landscape Sensitivity and Capacity Study for the Kimble area (2017) identified Option 4 for Kimble representing sites with the lowest landscape impact, coming to a lower figure of approx.. 137 dwellings. The Chilterns Conservation Board considers that even this is likely to be significantly too high given the wider non-landscape impacts (therefore not considered in the landscape study) which limit the suitability of Kimble to grow, including the heritage and biodiversity constraints described above. Reduce requirement for 160 homes at Kimble. Substitute with small-scale housing for local community needs.</p> <p><b>RUR7 Land off Clappins Lane, Naphill</b></p> <p>This site is in the Chilterns AONB. The number of homes has increased from the draft plan’s 40-50 to 64 dwellings. The Chilterns Conservation Board considers that the site may be appropriate as a smaller development, delivered as a Rural Exceptions Site as once proposed.</p> <p>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. These green links should be bolstered by widening the hedgerow into a tree belt on the site, and off-site works to continue the green corridor through more natural management of the verges on Clappins Lane up to the T junction with Main Road, and a thicker naturebelt alongside the allotment hedgerow to reach Naphill Common.</p> <p>The County Council comments state that Clappins Lane would require improvement, but the Board would not support removal of the oak tree to create an access this tree is an important larger tree in the corridor. The Board would object to the widening or introduction of pavements of Stockings Lane or Clappins Lane, as this would affect the beauty and rural character of these single track lanes. Our guidance note, prepared with the County Councils,</p>	
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	<p>Environmental Guidelines for the Management of Highways in the Chilterns  <a href="http://www.chilternsaonb.org/uploads/files/ConservationBoard/Environmental_Guidelines_Highways.pdf">http://www.chilternsaonb.org/uploads/files/ConservationBoard/Environmental_Guidelines_Highways.pdf</a> summarises advice on how to manage roads to conserve and enhance the special qualities of the AONB and avoid inappropriate changes.                  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 <b>towards the village centre, while retaining the oak tree,</b>”</p> <p><b>RUR8 Land South of Mill Road Stokenchurch</b>                  This site is in the Chilterns AONB and detached from the centre of Stokenchurch on the far side of the motorway. The Chilterns Conservation Board accepts that part of this site is previously developed and that there is scope for some residential development here. Redevelopment of the timber yard could bring a visual enhancement, as long as the residential development is well screened and follows the advice on building design and materials in the Chilterns Buildings Design Guide. CCB would not support further development beyond this site into the attractive undulating countryside of the AONB. A firm and defensible settlement boundary should be established through the plan and the development layout. The site lacks a boundary to prevent future pressure for development. Removal of the tall building in the background (part of DJ Giles reclamation yard) and undergrounding of overhead wires could benefit the landscape. Amend layout to establish no further future encroachment into the AONB. On fig 39 the alignment of the new footpath to the motorway bridge is shown on the illustrative layout as running into the side of the motorway footbridge. To gain access to the footbridge the path would need to be further to the north west.</p> <p><b>RUR10 Land to the Rear of Stokenchurch Business Park, Ibstone Road, Stokenchurch</b>                  This site is in the Chilterns AONB. The site is too large, a smaller site may be acceptable. In terms of uses, the Chilterns Conservation Board would recommend removing B8 uses from the policy, as these would be likely to involve large warehouses with a greater landscape impact (potentially constituting major development), and draw unsuitable HGVs through access via the Chilterns Business Park. The access should not be through the rural green lane and footpath. The triangle of farmland north of the track should be removed from the allocation as large buildings here would be visible from the footpath and attractive open countryside to the west. No vehicular access should be through the lane with footpath. The rural character of the track running south west of the site boundary should be conserved. The site adjoins open countryside the character of which should be conserved. Development of the triangle of land north of the track would affect views back from the public footpath, suggest remove this from the allocation.                  Amendments: Delete B8 uses. Delete the triangle of land north of the track as this would affect views back from the public footpath.</p> <p><b>RUR11 Heavens Above, 16 High Heavens, Marlow Bottom</b></p>	
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	<p>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. This allocation fails to give great weight to conserving and enhancing the natural beauty of the AONB as required by para 115 of NPPF.</p> <p>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.</p> <p>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.</p> <p>Delete allocation.</p> <p><b>Policy DM30 The Chilterns Area of Outstanding Natural Beauty</b></p> <p>The AONB policy has deteriorated since the draft plan version (June 2016). It is not consistent with national policy because it:</p> <ul style="list-style-type: none"> <li>• Does not give great weight to AONB (NPPF para 115)</li> <li>• Does not mention the second test for major development: the public interest test (NPPF para 116)</li> <li>• Turns the clear instruction in the NPPF that major development in the AONB ‘should be refused’ into a positively worded ‘will only be permitted...’</li> <li>• Now contains the caveat “where possible” in relation to enhancing the natural beauty of the AONB (this not what the CRoW Act 2000 sec85 says, it is “conserve and enhance”, not “conserve and where possible enhance”)</li> <li>• Weakens the status of the AONB setting by adding “not a significant adverse impact on the natural beauty of the AONB”</li> <li>• Fails to benefit from the joint cooperative work by the Chilterns AONB Planning Forum to create a model policy for the Chilterns AONB</li> </ul> <p>The AONB policy does not fulfil AONB policy and statutory requirements. The Chilterns Conservation Board recommends replacing it with the model policy for the AONB developed jointly by policy officers from across the Chilterns AONB.</p> <p>One of the outcomes of a meeting of Buckinghamshire policy planners in January 2016 was a request to the Chilterns Conservation Board to propose a model AONB policy, drawing on good practice and experience locally and from others AONBs. The Board recommends that this model policy, finalised following discussion at CCB’s Planning Forum in June 2016 and adopted at a meeting of the Full Board, should be incorporated in all the emerging Local Plans that cover the Chilterns AONB or its setting. This would provide consistency, save officer time, and represent a positive example of the local authorities working together to safeguard the future of a shared nationally protected landscape area.</p>	
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<p>South Oxfordshire Local Plan Reg 19 publication</p>	<p>SODC</p>	<p><b>STRAT9: Land at Chalgrove Airfield</b>          Watlington Hill in the Chilterns gives among the most magnificent panoramic views in Oxfordshire. On a clear day it is possible to see most of South Oxfordshire from here; the towers of Didcot power station to the west, to the M40 and beyond to the east, and straight ahead across the Oxfordshire Vale all the way to the spires of Oxford. Chalgrove Airfield lies in the middle distance in that view towards Oxford, behind Watlington (which is also set to grow under policy H4 raising a cumulative effects question).</p>	<p>30.11.17</p>

	<p>Watlington Hill is open access land in the nationally protected AONB landscape, managed by the National Trust, so constitutes a very high value visual receptor. The policy STRAT9 fails to mention or address the setting of the AONB or views from Watlington Hill. The CCB does not object to the allocation but wishes to see changes to ensure the views from the AONB are conserved and enhanced. This could be achieved by creating strong landscape edges to the development, for instance provision of structural planting along the eastern boundary. There is an opportunity to replace the unusual triangular shape of the airfield in the landscape with a pattern that restores the traditional field boundaries. Planting could also usefully be located east of Monument Business Park to improve screening of some existing large employment buildings. As well as structural planting, care will be needed with site layout, building heights, materials, colour and external lighting. Further advice is available in the CCB's Position Statement on Development Affecting the Setting of the Chilterns AONB available here <a href="http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html">http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html</a></p> <p>The following suggested changes would address the CCB's representation:</p> <p>1 Para 4.60 "The site is also outside the AONB and the Green Belt and is centrally placed in South Oxfordshire. <b>Although outside the AONB there are long distance views to and from the AONB which will need careful consideration in developing the plans.</b> We will support..."</p> <p>2 Add to policy vii) appropriate landscaping <b>and structural planting to screen the development in views from the Chilterns AONB</b>, and an integrated network of green infrastructure that links to locally important wildlife sites and the enhancement of ecologically important habitats;</p> <p><b>H5: Land to the west of Priests Close, Nettlebed</b></p> <p>This is a greenfield site on the edge of a rural village in the Chilterns AONB, within the wooded dip slope in an area with a sense of unspoilt ancient countryside. The site is not well located to the village, being beyond Priests Close, a former council estate which is itself a separate wing detached from the main part of the medieval settlement. Infill or brownfield sites within the village would generally be a better approach than allocating sites beyond the edge of the village than encroach into the countryside. The site has an access problem. The land between the site and the B431 road is common land, part of Nettlebed Common. Any new access across the common 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 <a href="https://www.gov.uk/guidance/carrying-out-works-on-common-land">https://www.gov.uk/guidance/carrying-out-works-on-common-land</a>. Applications are determined against criteria set out in Section 39 of the Act including nature conservation and the conservation of the landscape. There is no certainty that consent would be forthcoming. Looking at alternative accesses, Bushes Lane on the southern boundary of the site is an attractive winding holloway with an earth bank and hedgerow on top, it would be entirely unsuitable to upgrade this to provide vehicular access. It is a restricted byway so a right of way for walkers, horse riders, cyclists and non-</p>	
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	<p>mechanically propelled vehicles. The only acceptable access option from an AONB point of view would be to acquire and demolish a house on the western side of Priest's Close to provide access. In the absence of such an agreement, this allocation is not effective, and the site should not be assessed as available or achievable. The suitability of the site is also in question. There is also a need for ecological assessment for this site. The land is pastureland in the AONB next to Common, and within the impact zone for Priests Hill geological SSSI. On a site visit we noted habitats including a thick hedgerow with mature coppiced hazel (potentially suitable for mammals such as dormice), and a historic looking pond (which could be suitable for amphibians including newts) within the site at the north eastern corner. The Common Land between the site and the B431 road is Woodpasture and Parkland BAP Priority Habitat. The site does not feature in the detailed settlement reports in the Council's <i>Landscape Capacity Assessment: Sites on the Edge of the Larger Villages of South Oxfordshire: Main Report 2015 Prepared on behalf of South Oxfordshire District Council by: Kirkham Landscape Planning Ltd and Terra Firma Consultancy</i>. This is because the site (known as NET1) failed at the first stage; because it had "potential for harm to landscape setting of Nettlebed and AONB as a result of settlement expansion into wider landscape". The report recommended that the site did not proceed to Phase 2. There is therefore no detailed landscape capacity assessment or layout advice for this site.</p> <p>There appears to be gaps in the evidence base regarding landscape and biodiversity which make this allocation not properly explored or justified. Para 115 of the NPPF requires great weight to be given to conserving and enhancing landscape and scenic beauty in AONBs. Proceeding with an allocation against the advice of the Council's own landscape capacity assessment does not demonstrate that great weight has been applied.</p> <p>The HELAA 2016 incorrectly identifies the site as 0% AONB (should state 100%), and answers the question 'Within/adjoining common land' with "No". The SHELAA by Arup (Oct 2017) again incorrectly identifies the site as 0% AONB and comments "Access required across Common Land but expected to deliver in first five years owing to small size of site". Both HELAA and SHELAA conclude that this site is suitable, available and achievable. If the AONB and Common Land status had been correctly recorded, this may have changed the suitability to "No".</p> <p>There are gaps in the evidence base, errors in the site assessment, and too much uncertainty about the suitability and availability of this site (especially given the access over Common Land issue) to proceed with this allocation.</p> <p>Delete allocation</p> <p><b>H7: Land to the South and West of Nettlebed Service Station</b></p> <p>This is a greenfield site located on the top of the plateau in Nettlebed (LCA 10 Chilterns Plateau with Valleys/ LCT Semi-enclosed dip slope). It is adjacent to a petrol station (Nettlebed Service Station) and a brownfield area comprising a motor vehicle repair garage (Hillcrest Specialist Cars), and associated storage/ parking of vehicles, most of which appear to have been stored there for the long term. It would potentially visually enhance the AONB to remove and redevelop this rear brownfield area, but instead the allocation is for the greenfield site to the south and west of the site. Although it has a fairly good level of screening with trees, more</p>	
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	<p>structural planting screening would be needed to conserve long and short distance views. The fieldwork for the Council's landscape capacity assessment was carried out in 2014, when young recently planted trees were shown within the site (Photo 1 in the LCA). These have now grown, and the land contains young trees below which low intensive outdoor pigs are run, given the land a positive and attractive use which would be lost to development if the allocation proceeds. The allocation as it stands would undesirably extend the settlement of Nettlebed westwards along the road. The Council's South Oxfordshire Landscape Assessment by Atlantic Consultants, adopted as SPG, concludes for the Chilterns Plateau and Valleys that: "special attention should be paid to creating strong landscape 'edges' to settlements to reduce the urbanising influences of development on adjacent countryside and to prevent ribbon development along roads and the coalescence of settlements."</p> <p>(p63). Expanding the village westwards risks doing exactly this. It would raise pressure for future development on site NET4 on the opposite side of the A4130 Port Hill.</p> <p>The portion of the site to the west of the petrol station should be kept for structural planting and for the continuation of the agricultural enterprise. The car parking/ car storage in the western area should also be removed as an AONB enhancement. An additional policy criterion should be added should include the advice from the Council's landscape assessment "Substantial green infrastructure link and landscape buffer to be created between the open landscape of the AONB and the village edge".</p> <p><b>STRAT1: The Overall Strategy</b>          The CCB would like to see more emphasis on the AONB in the overall strategy.          Around half the district is covered by AONB, which is a nationally protected landscape. AONBs are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England and Wales are conserved and enhanced. In policy terms they have the same planning status as National Parks. The Countryside and Rights of Way Act 2000 section 85 places a statutory duty on local authorities to have regard to the purpose of conserving and enhancing the natural beauty of AONBs when coming to decisions or carrying out their activities relating to, or affecting, land within these areas.          South Oxfordshire is the largest of the ten local authorities with land in the Chilterns AONB, with 27.9% of the Chilterns AONB falling within South Oxfordshire. Having a good development plan strategy and set of policies in South Oxfordshire is essential for the long term future of the Chilterns AONB, and SODC holds a very significant responsibility to cherish it. Conserving and enhancing the AONB should be promoted the first bullet point in the strategy. This would also be consistent with the Council's saved South Oxfordshire Local Plan 2011 which put 'protecting and enhancing the natural and built environment' as its first key objective. The current overall strategy bullet point (number 7) is 'protecting and enhancing the countryside and particularly those areas with the AONBs and Oxford Green Belt by ensuring that outside towns and villages any change relates to very specific needs such as those of the agricultural industry or enhancement of the environment.' This is flawed in that it fails to reflect the designations hierarchy or give</p>	
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	<p>great weight to the AONB as required by the NPPF para 115: it puts the general countryside before the AONB, and the AONB and Green Belt on an equal footing. It also assumes that the AONB is land outside towns and villages, when in fact many of the AONB settlements are washed over or enclosed by the AONB, and the special qualities of the Chilterns AONB include the villages with their brick and flint houses.</p> <p>Promote conserving and enhancing the AONB to the first bullet point in the strategy, in order to give it the great weight set out in NPPF para 115.</p> <p>Disentangle AONB from Green Belt and the wider countryside. Put AONBs first to reflect the designation hierarchy and comply with the NPPF para 113 that "Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.</p> <p>Re-word 'protecting' to 'conserving' to match NPPF para 115, and the words used in AONB legislation in the Countryside and Rights of Way Act 2000 section 85.</p> <p><b>STRAT2: The need for New Development in South Oxfordshire and para 4.15</b></p> <p>The CCB disagrees with the statement in para 4.15 that "National Planning Policy is clear that local planning authorities should ensure that they meet the full, Objectively Assessed Needs for market and affordable housing in the Housing Market Area". In fact National Policy is caveated and refers to designations including AONB which should be taken into account when establishing the appropriate quantum of development: NPPF para 182 states "the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so an consistent with achieving sustainable development".</p> <p>NPPF para 14 and 47 on meeting full OAN only "as far as is consistent with the policies set out in this Framework", with a special exemption for the AONB in footnote 9, and repeated in advice in Planning Practice Guidance para 044: "The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits , when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted . Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty , Heritage Coast or within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion."</p> <p>SODC has made no cumulative assessment of the effect on the AONB of this quantum of development or sought to set a lower than OAN figure, instead opting for uplifts and accepting unmet need from Oxford. The quantum of new housing and employment land proposed is too high and fails to adjust for the constraint of the AONB.</p>	
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	<p>The southern half of the district is covered by the two AONBs, where National Planning Policy states that planning applications for major development in the AONB should be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest (NPPF para 116). No process appears to have been undertaken to moderate the OAN housing number in the SHMA based on the high level of constraint in the district. The spatial strategy in the plan involves development at AONB settlements, which in practice means housing development on AONB green field sites at the edge of settlements. The adverse impacts of meeting full OAN, plus unmet need for Oxford, has not been properly assessed. In order to achieve the purpose of the AONB any development that takes place should ensure the conservation and enhancement of the natural beauty of the area. This means that the AONB should not be considered as a no-go zone, equally any development that does take place should invariably be small-scale and sensitive in nature. The Local Plan fails to recognise this.</p> <p>By failing to have a distinctive strategy for the AONB settlements, the Council has not demonstrated that it is following national policy on protected landscapes (NPPF para 115 and 116), or its duty of regard to the AONB under the Countryside and Rights of Way Act 2000 Section 85.</p> <p>Modification(s):          Apply footnote 9 of the NPPF and lower the quantum of development in Policy STRAT2 to reflect constraints including the AONBs.</p> <p>Correct the wording in STRAT2 "provision will be made to meet the need for..." because the levels listed are not need but include uplifts which take them beyond what is required (economic growth and affordable housing uplifts as explained in para 4.20). Correct the wording in para 4.15 to reflect the NPPF caveats about meeting full OAN where policies indicate development should be restricted (including AONB).</p> <p><b>Table 5c Expected sources of housing supply</b>          The row in the table "Sites in the smaller villages (Neighbourhood Plans and infill sites) and windfall sites" should be split into 2 rows. Windfalls should be reported as a separate row because not all windfalls are in smaller villages, there will be windfalls and infill in the towns, larger villages and thorough barn conversions etc in the wider countryside. Once granted these would appear in "Commitments" but a row is needed to include a windfall allowance for future years.</p> <p>Modifications:          Split row "Sites in the smaller villages (Neighbourhood Plans and infill sites) and windfall sites" to allow separately for:</p> <ol style="list-style-type: none"> <li>1. Housing in the smaller villages and rural areas</li> <li>2. Windfall allowance (district wide)</li> </ol> <p><b>H1: Delivering new homes</b>          This policy is long and badly worded. There is a risk of misinterpretation, unintended consequences and protracted discussions and delays through the development management process. The policy as drafted allows housing development on all previously-developed land in and adjacent to towns and larger</p>	
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	<p>villages with its uncaveated wording "will be permitted". This will have the effect that all garden centres, stables, quarries, scrapyards, scout huts, mobile homes sites, institutions, employment land etc on the edge of settlements will be likely to come forward for housing development, and the policy will permit them without caveat about impact on the natural and historic environment, highway safety, loss of employment, loss of valued facilities or respect to the policies of a neighbourhood plan which may have chosen not to allocate the sites. This policy risks outwards sprawl of development into the countryside and harm to the setting of villages and the AONB. Some rural PDL sites are very large, earlier examples in South Oxfordshire include the CABI site, Fairmile Hospital, Highlands Farm, Mongewell Park. Future ones could include RAF Benson or even Howbery Park (both PDL adjacent to a larger village). This policy would in theory allow Chalgrove Airfield (PDL adjacent to a larger village) as a windfall, when its future is much better dealt with as strategic allocation and comprehensively planned. The policy conflicts with Policy EMP3 on retention of employment land. As it stands the policy is too permissive, caveats are needed. The policy wording could also be misread as allowing housing on PDL in built-up areas and allowing housing on greenfield land adjacent to built up areas. Not all infill is appropriate, suggest adding the word "It is appropriate infilling" and cross referring to Policy H16 which contains important caveats about land in settlements which is unsuitable for infilling. As it stands there is a lack of consistency between H1 and H16. The travelling community policy is missing an important word "and". As it stands it implies that personal and temporary permissions will be the exception not the rule, so that most caravan permissions will be permanent and general.</p> <p>Modification(s)          These points could be addressed by clarifying the wording in H1 as follows:          "On sites that are not allocated, housing development and conversions to dwellings will be permitted on previously-developed land which is in or adjacent to the existing built-up areas of towns and larger villages provided that it does not conflict with other policies in the development plan. In other locations, the potential to develop PDL will be balanced against other policies of the development plan, particularly with reference to safe and sustainable access to services and facilities and safeguarding the natural and historic environment. ""ii) It is appropriate infilling (see Policy H16) within the existing built up areas..."          "Permission for single residential caravans or mobile homes will only be given in exceptional circumstance and on a temporary and personal basis"</p> <p><b>H3: Housing in the towns of Henley-on-Thames, Thame and Wallingford</b>          The allocation at Henley-on-Thames is too high. Henley-on-Thames is constrained by the AONB, and the Council has a statutory duty under the Countryside and Rights of Way Act 2000 (section 85) to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. The NPPF para 115 instructs that "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in</p>	
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	<p>relation to landscape and scenic beauty.” Very little weight appears to have been given in the distribution decision.</p> <p>The numbers could easily be lowered by reducing the over-supply provided for in the plan (22,563 as opposed to 20,800 - see table 5c and para 5.9). The 15% allocation, on top of Core Strategy allocations, could involve major development in the AONB, which is specifically prohibited by paragraph 116 of the NPPF unless in exceptional circumstances and where it is in the public interest. Accommodating a mathematically-derived proportion of housing growth is unlikely to meet that test, it is not exceptional, there are no national considerations, and alternative sites outside the AONB exist in the district (and wider housing market area). It is unsatisfactory to park the issue of what is acceptable until the neighbourhood plan process, as proposed by para 5.13 "Ultimately the detailed evidence base will need to be provided to support each NDP and its assessment of capacity, whether this is to support a higher or lower number than that provided in Table 5d". It runs counter to the requirement for strategic environmental assessment to ensure that options and their effects are explored and understood. Para 5.13 suggesting a case of a lower number could be made through the NDP process is also inconsistent with Policy H3 which takes a tougher stance, referring to the numbers as "requirements" and stepping in with a presumption in favour for planning applications if NDP's have failed to meet these "requirements". The sanction of a presumption in favour is directly inconsistent with para 5.12 which states that the sanction would be that the local planning authority would step in to make allocations in those towns. Clarity is needed: is it allocations or speculative applications? Also, if speculative applications have been granted permission, as at Winterbrook south of Wallingford, should be deducted on an on-going basis from that town's figure, reducing the need for allocation. Establishing a local presumption in favour is contrary to the NPPF para 14 footnote 9 which clearly establishes that a presumption in favour is not to be applied in AONBs. Table 5d and Policy H3 also lack clarity that the targets for NDPs are on top of Core Strategy numbers for the market towns.</p> <p>Modification(s)</p> <p>The housing numbers for Henley-on-Thames should be reduced to take into account the constraint of the AONB. The Council needs to demonstrate it is meeting its statutory duty of regard towards conserving and enhancing the AONB. This is likely to mean lower numbers for Henley-on-Thames, which is highly constrained and should again be capped as in the Core Strategy, and potentially for Wallingford which is in the setting of both the Chilterns AONB and North Wessex Downs AONB.</p> <p>The sanction establishing a presumption in favour should be amended as follows: "If a Neighbourhood Development Plan has not adequately progressed with allocating sites* <b>and numbers have not been met otherwise through planning applications</b> to meet these requirements within 12 months of adoption of this Local Plan, planning applications for housing in the market towns will be supported provided that proposals comply with the overall housing distribution strategy as set out in policy STRAT1 <b>and unless specific policies in the NPPF indicate development should be restricted**.</b></p> <p><b>**see footnote 9 of the NPPF."</b></p>	
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	<p><b>H4: Housing in the Larger Villages</b></p> <p>The CCB does not support applying a proportional growth figure of 15% growth, on top of Core Strategy numbers, to the larger villages. Since 15% on top of Core Strategy numbers is the same percentage as the market towns, this is no kind of a spatial planning hierarchy. The numbers could easily be lowered by reducing the over-supply provided for in the plan (22,563 as opposed to 20,800 - see table 5c and para 5.9). The Council has a statutory duty under the Countryside and Rights of Way Act 2000 (section 85) to have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. The NPPF para 115 instructs that "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty." Very little weight appears to have been given in the distribution decision. The larger villages policy H4 does not mention the AONB. The 15% allocation could involve major development in the AONB, which is specifically prohibited by paragraph 116 of the NPPF unless in exceptional circumstances and where it is in the public interest. Accommodating a mathematically-derived village growth percentage is unlikely to meet that test; it is not exceptional, there are no national considerations, and alternative sites exist. It is unreasonable to defer to neighbourhood plans the responsibility for carrying out a major development assessment which should be done at the point of split between the larger villages, because neighbourhood plans are the wrong spatial scale to carry out the assessment of whether there are alternative sites not in the AONB (NPPF para 116 major development test second bullet). Settlements in or in the setting of the AONB should have special consideration. This national landscape designation will clearly constrain the ability to accommodate further development in the AONB and to a lesser extent in the setting of the AONB. The NPPF is clear that LPAs should allocate land of the least environmental or amenity value (para 110), which will mean avoiding land in the AONB or its setting. CCB considers that the Council should focus development on sites outside, and which do not affect the setting or appreciation of, the AONBs. It will require a spatial distribution which avoids AONB land and involves care in the setting of the AONB. In the AONB development should invariably be small in scale and to meet identified needs.</p> <p>The cumulative effects on the AONB need consideration, where multiple sites around a settlement are to be developed, where development will increase traffic levels and impact on air quality on roads through the AONB, or where recreation pressures on the AONB will increase. It is unsatisfactory to park the issue of what is acceptable until the neighbourhood plan process, as proposed by para 5.27 "Ultimately the detailed evidence base will need to be provided to support each NDP and its assessment of capacity, whether this is to support a higher or lower number than that provided in Table 5f". It runs counter to the requirement for strategic environmental assessment to ensure that options and their effects are explored and understood. Para 5.27 suggesting a case of a lower number could be made through the NDP process is also inconsistent with Policy H4 which takes a tougher stance, referring to the numbers as "requirements" and stepping in with a</p>	
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	<p>presumption in favour for planning applications if NDP's have failed to meet these "requirements".</p> <p>The sanction of a presumption in favour is directly inconsistent with para 5.18 which states that the sanction would be that the local planning authority would step in to make allocations in those larger villages. Clarity is needed: is it allocations or speculative applications? Also, if speculative applications are granted permission, these should be deducted on an on-going basis from that village's figure, reducing the need for allocations.</p> <p>Establishing a local presumption in favour is contrary to the NPPF para 14 footnote 9 which clearly establishes that a presumption in favour is not to be applied in AONBs.</p> <p>Table 5f and Policy H4 also lack clarity that the targets for NDPs are on top of Core Strategy numbers for the larger villages.</p> <p>Modification(s)</p> <p>The housing numbers for the larger villages should be reduced to take into account the constraint of the AONB. The District Council needs to demonstrate it is meeting its statutory duty of regard towards conserving and enhancing the AONB, and the Parish Council's preparing neighbourhood plans will also have to demonstrate AONB regard. This is likely to mean lower numbers for Goring, Nettlebed, Woodcote (all washed over by Chilterns AONB) and Chinnor, Cholsey, Crowmarsh Gifford, Sonning Common and Watlington (part in AONB). The sanction establishing a presumption in favour should be amended as follows: "If a Neighbourhood Development Plan has not adequately progressed with allocating sites* <b>and numbers have not been met otherwise through planning applications</b> to meet these requirements within 12 months of adoption of this Local Plan, planning applications for housing in the larger villages will be supported provided that proposals comply with the overall housing distribution strategy as set out in policy STRAT1 <b>and unless specific policies in the NPPF indicate development should be restricted**</b>.  <b>**see footnote 9 of the NPPF.</b>"</p> <p><b>H8: Housing in the Smaller Villages</b></p> <p>The smaller villages of South Oxfordshire include some picturesque and historic villages in the Chilterns AONB. 500 homes in the smaller villages is too large a number. This figure of 500 jumbles up three sources of housing supply: smaller village allocations in NDPs, infill development and small site windfalls. This is unsatisfactory. It includes infill and windfalls which could be anywhere in the district (Didcot, market towns, larger villages, smaller villages, rural areas). Windfalls should be accounted for separately (please see our representation concerning Table 5c), reducing the number in smaller villages downwards.</p> <p>A 5% increase for each smaller village is too large a scale of development. Caveats are needed and cross references to other policies, for example to draw across the size limit of 5-6 dwellings per development in Policy H16 on windfalls.</p> <p>The policy will be ineffective in that it will incentivise developers to put in speculative applications where there is no neighbourhood plan in preparation; it will set off a race. First to apply will get permission until the (unclear) 5-10% increase is met, from which point presumably other applications should then be refused? "Suitable sites" are likely to be greenfield sites, and there is no size limit. This is inappropriate in smaller villages, where several small infill sites are likely to be more acceptable than one large site.</p>	
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	<p>Smaller villages in or in the setting of the AONB should have special consideration. This national landscape designation will clearly constrain the ability to accommodate 5-10% development.</p> <p>Modification(s)</p> <p>This policy H10 should just set out the scale of development that is acceptable in smaller villages, and cross refer to other policies. The total number of minimum of 500 is too high, suggest reduce to 200, by accounting for windfalls separately in Table 5c.</p> <p>Add a size limit for each development (eg 5-6 homes for consistent with policy H16) so that no smaller village is dominated by a large new bolt-on estate. The smaller villages policy should make a distinction between AONB and non-AONB villages.</p> <p><b>Para 5.39</b></p> <p>This section on other villages needs a policy, not just supporting text. It should explain that housing in other villages and wider countryside is strictly controlled and that planning permission for new housing will not be granted. The current para 5.39 ("proposals map come forward over the Plan period in these villages, such as single dwellings, infilling and conversions") implies that new single isolated dwellings are permissible, this conflicts with NPPF para 55 which only allows new dwellings in very strict circumstances.</p> <p>Modification(s)</p> <p>Add new policy explaining that housing in other villages and wider countryside is strictly controlled and that planning permission for new housing will not be granted unless it meets NPPF para 55.</p> <p><b>H18: Replacement Dwellings</b></p> <p>Replacement dwellings of inappropriate design are one the more insidious features of the last few years, with some controversial developments which have harmed the Chilterns AONB in their scale, materials, light spill and residential paraphernalia. There are some high budget 'grand designs' with swimming pools, security lodges etc. The policy should contain design advice, it is not clear why this has been deleted from the last draft of the plan.</p> <p>Modification(s)</p> <p>Reinstate the policy criterion which was in the Preferred Options (amended to refer with nationally designated landscape) as follows:</p> <p><b>v) The proposed replacement dwelling is in accordance with the relevant policies of the adopted development plan including in relation to providing high quality and inclusive design, SuDS, protected species, nationally designated and local landscape features, and protects the amenity of occupants of nearby properties; and</b></p> <p><b>TRANS1: Supporting Strategic Transport Investment</b></p> <p>The provision in bullet point (v) for improvements in the Reading area including a new Thames Crossing should be removed. The CCB would object to any proposal that would increase vehicular traffic through the Chilterns AONB or affect the rural character of its roads and villages. A new crossing or park and ride would increase traffic, noise and air pollution in the AONB, reducing tranquillity and affecting habitats (see recent Plantlife report on effects on nitrogen pollution on flora <a href="http://www.plantlife.org.uk/uk/our-work/policy/nitrogen">http://www.plantlife.org.uk/uk/our-work/policy/nitrogen</a>). As well as volume, changes to the type of traffic (e.g. more HGVs or more through traffic cutting between motorways) would be of concern. A bus-only bridge would be likely</p>	
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		<p>to attract nuisance parking in AONB villages by commuters leaving their cars and catching bus across a new bridge into Reading, affecting the character and peace of villages. Modification(s) Delete (v) since adverse impacts on the AONB are inevitable.</p> <p><b>ENV1: Landscape and Countryside</b> There is no standalone policy for the AONB. As it stand the policy is muddled and fails to reflect the hierarchy that is required under NPPF para 113 "Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks." The plan has good well constructed policies on biodiversity and watercourses, but just one bullet point on the AONB in a wider landscape and countryside policy. That bullet point only deals with major development in the AONB and is silent on non-major development (which is the majority of applications in the AONB). It fails to give great weight to the AONB (NPPF para 115). The CCB would like to offer assistance with the wording for a standalone policy on the AONB. One of the outcomes of a meeting of policy planners in January 2016 was a request to the CCB to propose a model Chilterns AONB policy, drawing on good practice and experience locally and from others AONBs. This model policy was refined at an AONB Planning Forum workshop of policy planners from across the 13 local authorities of the Chilterns AONB, and adopted by the CCB in October 2016 as the policy CCB would recommend to be incorporated in all the emerging Local Plans that cover the Chilterns AONB. This would provide consistency, save officer time, and represent a positive example of the duty to cooperate, with the local authorities working together to safeguard the future of a shared nationally protected landscape area. To achieve strong compliance with the purpose of the AONB, national planning policy and AONB management plan objectives, it was agreed at the Chilterns AONB Planning Forum a local plan should cover: 1 Weight given to AONB 2 Conserving and enhancing 3 Setting 4 Tranquillity and remoteness 5 Cumulative impacts 6 AONB Management Plan 7 AONB supporting guidance eg Design Guide 8 Local descriptive material e.g. special qualities of Chilterns **Some LPAs may prefer to cover the final three in the supporting text to the policy</p> <p>The principles are met in the Model Policy and the associated supported text. The CCB recommends inclusion of this model policy and supporting text in the draft of the Local Plan.</p> <p>Include a new standalone policy in on the AONB, using the model policy developed by the CCB working with planners from across the AONB local authorities.</p>	
<p>Ivinghoe Parish NDP Draft pre-sub plan</p>	<p>AVDC</p>	<p>Thank you for addressing many of the points the CCB raised at the last consultation stage in October 2017. The Board has a number of comments, some outstanding and some new, as follows:</p> <p><b>Settlement boundaries</b> The CCB <b>objects</b> to the settlement boundary shown in Figure 8.</p>	<p>5.12.17</p>

		<p>The boundary should be re-drawn more tightly to the settlement of Ivinghoe. Extensive greenfield land around the village has been included within the settlement boundary, some of it within the Chilterns Area of Outstanding Natural Beauty (AONB). Policy HSG1 in effect allocates all of this land within the boundary as acceptable in principle for housing development. There is no evidence base on which to do this. There has not been any landscape capacity assessment or assessment of the AONB impacts of developing this land. It is not acceptable to proceed with the wide settlement boundary as drawn.</p> <p>By way of example, Dacorum Borough Council proposed an allocation in the AONB west of Tring, to which CCB objected at Examination. The Planning Inspector concluded<sup>1</sup>: "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. <b><i>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...</i></b> 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.</p> <p>The proposed settlement boundary of Ivinghoe on Figure 8 and Ivinghoe Aston on Figure 9 also include greenfield land in the setting of the AONB (eg Ivinghoe golf course, the allotments and woodland off Church Road), again without a landscape capacity assessment or assessment of AONB impacts. Please see the CCB's <a href="#">Position Statement on Development Affecting the Setting of the AONB</a>. It explains how developments outside the AONB but in its setting can affect the AONB, and signposts to the Chilterns AONB Management Plan policies concerning AONB setting, including:</p> <p>Vision: The setting of the Chilterns is valued and protected by ensuring development adjacent to the AONB also respects its national importance.</p> <p>Policy L4: The distinctive character of buildings, rural settlements and their landscape setting should be conserved and enhanced.</p> <p>Policy L5: Developments which detract from the Chilterns' special character should be resisted.</p> <p>Policy L7: The quality of the setting of the AONB should be conserved by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns.</p> <p>Policy D9: Full account should be taken of the likely impacts</p>	
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<sup>1</sup> <https://democracy.dacorum.gov.uk/ieDecisionDetails.aspx?AllId=4447> See Local Planning Framework site allocations Annex A – Inspector's Post Hearing Note

		<p>of developments on the setting of the AONB.</p> <p>The proposed settlement boundaries also include land covered by heritage constraints, such as greenfield land in Ivinghoe Conservation Area and next to Listed Buildings, and land to the west of the B488 which could be in the setting of Pitstone Windmill. Registered Common Land (the Rag Pit) north of the B489 should not be included in the settlement boundary. There are also biodiversity layers like land within the SSSI Impact Zone, and land containing Priority Habitat (Deciduous Woodland), and land in the Ashridge &amp; Ivinghoe Beacon Biodiversity Opportunity Area. The settlement boundary should be more tightly drawn to hug existing buildings, and exclude parcels of greenfield land many of which are covered by multiple designations or constraints.</p> <p><b>General approach to the AONB</b></p> <p>The Chilterns Conservation would welcome more emphasis on the Chilterns Area of Outstanding Natural Beauty. Paragraph 2.3 could say more about the AONB, and the international significance of the SAC. For example you could add this suggested text:</p> <p>“Well over half 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 the area that is not designated AONB forms part of the setting of the Chilterns AONB. The panoramic views from the top of the escarpment (especially the iconic Ivinghoe Beacon and Pitstone Hill) and the views to this dramatic chalk landform from the village makes this a special and remarkable area of which the parish should be justly proud. The area is rich in history, with a hillfort, barrow and ancient earthworks in the hills, and contains habitats identified as of international value (Special Area of Conservation) and national value (SSSIs and ancient woodland), and biodiversity opportunity areas.”</p> <p>Please refer the Ridgeway National Trail in paras 2.5. Ivinghoe Beacon is the end of this ancient route, it is of national importance, see <a href="http://www.chilternsaonb.org/explore-enjoy/walks-rides/ridgeway.html">http://www.chilternsaonb.org/explore-enjoy/walks-rides/ridgeway.html</a></p> <p>The plan should refer to the <a href="#">Chilterns AONB Management Plan 2014-2019: A Framework for Action</a> (CCB) in the introductory chapters and it should be listed in Appendix 1. This is because Government Planning Guidance<sup>2</sup> explains that AONB management plans should be taken into account in neighbourhood plans.</p> <p>As a protected landscape, with equal planning status to National Parks, <b>great weight should be given to conserving landscape and scenic beauty of Areas of Outstanding Natural Beauty</b> (set out in the Government’s National Planning Policy Framework para 115<sup>3</sup>).</p> <p>Paragraphs 116 of the NPPF explains that “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.” The Ivinghoe</p>	
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<sup>2</sup> See <https://www.gov.uk/guidance/natural-environment> para 004 Reference ID: 8-004-20140306)

<sup>3</sup> See <http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/11-conserving-and-enhancing-the-natural-environment/>

	<p>Neighbourhood Plan needs to have regard to national policy, including policy on AONBs, and be in general conformity with the strategic policies in AVDC's development plan, as these form some of the basic conditions against which neighbourhood plans are tested at examination.</p> <p>Ivinghoe Parish Council, like AVDC, is a public body subject to the duty in the Countryside and Rights of Way Act 2000 Section 85 that "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".<sup>4</sup></p> <p><b>Policy HSG1</b></p> <p>In this latest version of the policy, there is no coverage of impact on views. Please reinstate a bullet point on impact on views into and out of the Area of Outstanding Nature Beauty (AONB), e.g.:</p> <ul style="list-style-type: none"> <li>• <b>"Does not give rise to unacceptable impacts on views into and out of the Area of Outstanding Nature Beauty"</b></li> </ul> <p>For conformity with national policy in NPPF para 116, the wording on major development should refer not only to exceptional circumstances but also to public interest. The words 'into the AONB' are also confusing. 'Resisted' should be replaced with 'refused'. Suggest instead <b>"Planning applications for major development in the AONB will be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest. In the setting of the AONB, full account will be taken of the likely impacts of development on the AONB, as views out of and back to the AONB are fundamental to the enjoyment of the AONB."</b></p> <p><b>Landscape Character</b></p> <p>Suggest referring to the landscape character assessment: Aylesbury Vale LCA (2008) Jacobs Engineering <a href="http://old.buckscc.gov.uk/environment/heritage-ecology/landscape/buckinghamshire-landscape-character-assessment/aylesbury-vale-landscape-character-assessment/">http://old.buckscc.gov.uk/environment/heritage-ecology/landscape/buckinghamshire-landscape-character-assessment/aylesbury-vale-landscape-character-assessment/</a>. This will help describe the character and sensitivity of the landscape in the Parish.</p> <p>Para 2.8 could refer to views in the other direction as follows (suggested additional text in bold): "There are many spectacular views which can be gained from various vantage points throughout the village, <b>as well as panoramic views from the escarpment over the village.</b>"</p> <p><b>Policy ENV1 Biodiversity net gain</b></p> <p>The CCB welcomes this policy, but disagrees with the text in para 5.5.4 which implies that this policy would not apply in the AONB.</p>	
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<sup>4</sup> See <http://www.legislation.gov.uk/ukpga/2000/37/section/85>

		<p>The policy should apply to the AONB, and any off-site net gain may most be usefully delivered in the Biodiversity Opportunity Area and AONB. Suggest delete the strikethrough words as follows: “This policy ensures that <del>areas not otherwise protected</del> <b>development</b> contributes to a net gain in biodiversity and hence to the improved provision of a range of ecosystem services”.</p> <p><b>Policy REC1 and REC2 Recreation</b></p> <p>These policies are welcomed but appear to be named strangely. The subject matter of both policies is community facilities (shops, library, halls, pub, allotments, sports facilities etc) but the policies are titled ‘recreation facilities’. The policies cover essential social and economic facilities, so suggest re-naming both from ‘Recreation facilities’ to ‘Community facilities’.</p> <p><b>Policy TEL1 Telecommunications technology</b></p> <p>This policy should refer to nationally protected landscape, as well as rural nature of the neighbourhood. The Board is concerned that “visually sympathetic” could encourage colour or design solutions, but if badly sited and prominent in views masts would still be seriously harmful. The policy should protect from the detrimental effects of poorly sited and poorly designed telecoms infrastructure. Be aware that the latest masts designs may be taller than existing familiar designs, so it is undesirable to give blanket support to the latest designs. The supporting text indicates that the policy is about broadband, so the policy could be more specifically about broadband infrastructure (e.g. cabinets) and not apply to telecoms (e.g. masts).</p> <p><b>Mapping</b></p> <p>Although the mapping has improved since the last version of the plan with the addition of maps from the Environmental Records Centre, some maps are still not clear enough:</p> <ul style="list-style-type: none"> <li>• Figure 11 <i>Environmental constraints</i> map is poor quality and hard to read e.g. the green colour of Parish boundary and SSSIs look too similar. The AONB hatching is obscured by the SAC block colour.</li> <li>• Figure 5 <i>Priority Habitats within Ivinghoe Parish</i> fails to show the Traditional Orchard clearly enough. For example the parcel ref SP9480815793 at Middle Path Farm is all but invisible. This map is not showing the Priority Habitat Inventory Deciduous Woodland layer (see <a href="http://www.magic.gov.uk/MagicMap.aspx">http://www.magic.gov.uk/MagicMap.aspx</a>)</li> <li>• Figure 3 would be better labelled as: Statutory <b>Biodiversity Sites within Ivinghoe Parish</b></li> <li>• Figure 4 would be better labelled as: Non-Statutory <b>Biodiversity and Geological Sites within Ivinghoe Parish</b></li> <li>• Figure 6 on Ivinghoe Conservation Area – could make this a heritage map and add listed buildings and scheduled ancient monuments</li> <li>• An extra map on Accessible countryside showing the National Trail (the Ridgeway), Registered Common Land</li> </ul>	
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		<p>(the two Rag Pits, Ivinghoe Common, and Mayditch Common at Ivinghoe Aston), open access land, National Trust owned land, and the public rights of way network could usefully be added given the special value of this area in the green infrastructure network.</p> <p><b>Regulations</b> To reflect 2015 and 2016 amendments and be up to date para 3.5 could refer to: 2012 Neighbourhood Planning Regulations <b>(as amended)</b>.</p> <p><b>Appendix 1</b> Suggest various CCB documents should be added to the list</p>	
<p>Dacorum Issues and Options and draft SA</p>	<p>DBC</p>	<p>Q1 The CCB broadly agrees with the analysis eg that the lowest level of housing growth (Option 1) performs best against the environmental SA/SEA objectives as it would require less house-building on greenfield sites and less water consumption, fewer additional cars on the roads etc. In addition it would reduce pressure for development in the nationally designated Chilterns AONB and the setting of the AONB.</p> <p>We recommend using a standalone objective: "To conserve and enhance the natural beauty of the Chilterns AONB". This is because at the moment the AONB is covered only as part of SA9: "To conserve and enhance landscape and townscape character and encourage local distinctiveness". This is not giving "great weight" to the AONB (as required by NPPF para 115) and it does not establish a hierarchy setting out the relative importance of designations (NPPF para 113: "Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.")</p> <p>The CCB welcomes the coverage in the Issues and Options SA Working Note of the cumulative effects of development on the Chilterns AONB. Understanding and recognising these effects both within the borough and across the whole Chilterns AONB will be important in assessing the soundness of the emerging local plan. CCB has adopted a new Position Statement: Cumulative Impacts of Development on the Chilterns, available at <a href="http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html">http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html</a> which should be of assistance in the next stages.</p> <p>Q2. Add reference to cross-boundary cooperation on the Chilterns AONB through the CCB</p> <p>Q3. Add reference to the Chilterns AONB Management Plan. The Government's Planning Practice Guidance explicitly states that AONB management plans should be taken into account: (NPPG Paragraph 004 Reference ID: 8-004-20140306).</p> <p>There are gaps in the evidence base for the Local Plan on assessing impacts on the AONB. The emphasis of the work so far is the Green Belt. Landscape is a late add-on to the Green Belt study, and shows little understanding of AONB impacts. There is not even a map showing the AONB boundary in the Arup work. The landscape work at a site level is mainly desk based and not detailed enough. It is overly focussed on whether the land parcel exhibits the special qualities of the AONB, which is not what Government</p>	<p>13.12.17</p>

	<p>policy or legislation says: Countryside and Rights of Way Act 2000 sec 85: "have regard to the purpose of conserving and enhancing the natural beauty of the AONB" - all of it, not just the subset of areas which happen to contain the special qualities. Furthermore not all AONB impact are visual or come under the heading of landscape eg effects on tranquillity, ecology, air pollution, dark skies. The message from the Planning Inspector re: the proposed Dacorum BC Site Allocation in the AONB west of Tring needs to be heeded. The Planning Inspector concluded "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". The CCB is willing to help with a brief for a study of the impacts of proposed allocations on the Chilterns AONB, as we have with a similar assessment for the emerging Chiltern and South Bucks Local Plan.</p> <p>Q4. The vision refers to "The natural beauty of the Chiltern Hills", it would be better to refer to the "the outstanding natural beauty of the Chilterns Hills" or the "the natural beauty of the Chilterns AONB".</p> <p>Q6. Add an objective on conserving and enhancing the nationally protected landscape of the Chilterns AONB. Also conserving and enhancing the natural beauty of the AONB should be listed in para 4.2.2 as an issue that needs to be addressed on a cross-boundary basis. There is already an established structure for this joint work (the CCB) and the process of AONB Management Plan preparation and review to set policy and actions for the AONB.</p> <p>Q7. Since Dacorum contains a significant expanse of the Chilterns Area of Outstanding Natural Beauty (AONB), nationally designated as one of the country's finest landscapes, and some of the area that is not designated AONB forms part of the setting of the Chilterns AONB, the CCB would welcome strong emphasis on the Chilterns Area of Outstanding Natural Beauty in the policy structure. A standalone policy for the AONB based on the model policy for the Chilterns AONB developed by policy planners from across the AONB (through Chilterns AONB Planning Forum in 2016) would ensure a best practice policy and cross-boundary cooperation. The model policy is available here <a href="http://www.chilternsaonb.org/conservation-board/planning-development/planning-training.html">http://www.chilternsaonb.org/conservation-board/planning-development/planning-training.html</a></p> <p>Q8. A settlement hierarchy approach is fine as a starting point, but levels of growth need to take account of constraints like the nationally designated Chilterns AONB. Where large settlements are constrained by the AONB or land in the setting of the AONB, the distribution will need to be moderated to ensure that the AONB is conserved and enhanced.</p> <p>The list in para 5.1.2 should have an extra bullet point: "conserve and enhance the Chilterns AONB". This should be high up the list to give it the 'great weight' required by NPPF para 115 and demonstrate the Council is aware of its statutory duty of regard towards the purposes of conserving and enhancing the natural beauty of the AONB.</p>	
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	<p>Q10. The plan should have a section and policy/policies specifically on the Chilterns AONB, distinct from the wider Rural Area. The future of the AONB is a pressing issue of its own, which should be higher profile than the Green Belt or undesignated countryside. Applying the same policy approach to Green Belt/AONB/ wider countryside does not reflect the different purposes (and in the case of AONB, statutory duty) and the different NPPF policies for these areas.</p> <p>Q11. Support the approach to maximise use of brownfield sites, and identifying the AONB as a very important factor in assessing where development should be located. The CCB recommends the Council undertakes further detailed work on the impacts of developing sites (both individually and cumulatively) on the Chilterns AONB. We would be willing to assist with the scope and brief for such work, which should include landscape and visual impact assessment as well as coverage of effects on tranquillity, ecology, water abstraction from chalk streams, air quality, dark skies etc.</p> <p>Q12. Add coverage of air quality. As well as impacting human health, research shows the effects of air pollution on the natural environment (see Plantlife report We Need to Talk About Nitrogen <a href="http://www.plantlife.org.uk/uk/our-work/policy/nitrogen">http://www.plantlife.org.uk/uk/our-work/policy/nitrogen</a>). Nitrogen deposited from the air and in rain enriches the soil, favouring species like nettles and dock, to the detriment of rarer plants. The proximity of the Chilterns Beechwoods Special Area of Conservation to the road network in Dacorum makes this a particular issue. The Site Improvement Plan for the Chilterns Beechwoods (<a href="http://publications.naturalengland.org.uk/publication/6228755680854016">http://publications.naturalengland.org.uk/publication/6228755680854016</a>) identifies that atmospheric nitrogen deposition exceeds the critical loads for ecosystem protection. CCB considers that growth in traffic in and across the Chilterns AONB should be limited to address air quality, this may require limiting development until vehicles are cleaner</p> <p>Q13. CCB supports the inclusion of the Chilterns AONB Management Plan and of particular relevance here, the Chilterns Buildings Design Guide and supplementary Technical Notes. When planning any development in the Chilterns AONB, the Chilterns Buildings Design Guide should be the most important influence on design, more so than wider generic documents and advice</p> <p>Q14. Since Dacorum contains a significant expanse of the Chilterns Area of Outstanding Natural Beauty (AONB), nationally designated as one of the country's finest landscapes, and some of the area that is not designated AONB forms part of the setting of the Chilterns AONB, the CCB would welcome strong emphasis on the Chilterns Area of Outstanding Natural Beauty in the policy structure. The identification of a standalone policy for the AONB is welcomed. This should be based on the model policy for the Chilterns AONB developed by policy planners from across the AONB (through Chilterns AONB Planning Forum in 2016) would ensure a best practice policy and cross-boundary cooperation.</p> <p>Q15. The NPPF explains at para 14 that Local Plans should meet objectively assessed needs, unless any adverse impacts of doing</p>	
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	<p>so would significantly and demonstrably outweigh the benefits, and unless specific policies in the Framework indicate development should be restricted. Examples of areas where development should be restricted are listed in footnote 9 of the NPPF. They are abundant in Dacorum BC, where there are Special Areas of Conservation, many sites designated as Sites of Special Scientific Interest, significant areas of land designated as Green Belt and Area of Outstanding Natural Beauty, designated heritage assets; and locations at risk of flooding. The process of establishing the housing requirement should involve taking the OAN figure and assessing capacity and constraints so that the figure is, if necessary, reduced. The capacity for development in landscape and environmental terms in Dacorum should establish the appropriate number. There is no evidence in the plan that this taken place, we are just being asked to select which OAN figure we favour as the starting point. The diagram in the plan shows OAN followed by a cog for testing housing growth options, including land designations like Green Belt and AONB, land availability information, local infrastructure capacity, SA, and feedback from consultation. This testing process needs to happen and the consultation should be asking what is the appropriate level of growth, not which OAN figure to use as a starting point. The CCB agrees with the conclusion in the SA Working Notes that the higher the level of growth, the greater potential for adverse effects. This could include</p> <ol style="list-style-type: none"> <li>1. more water abstracted to serve development from Chilterns chalk streams (a globally rare habitat and already none in Dacorum are in good health, mainly because of low flows from over-abstraction)</li> <li>2. loss of natural beauty</li> <li>3. "nibbling" of development at the edge of the AONB</li> <li>4. increased recreation pressure on honeypot sites like Ashridge</li> <li>5. nitrogen pollution from vehicle emissions affecting plantlife, especially the habitats of the Chilterns Beechwoods Special Area of Conservation.</li> </ol> <p>See CCB Position Statement on Cumulative Impacts of Developments on the Chilterns AONB which should be of assistance in identifying effects and assessing them</p> <p>Q15 Given the designations covering much of the housing market area it would be better to plan over a broader area so that development could be accommodated beyond the Chilterns AONB and its setting.</p> <p>Q17. In the AONB you can require affordable housing contributions on smaller sites than 11 or more. See for example the policy in the emerging South Oxfordshire Local Plan Policy H9</p> <p>Q19. CCB would support a phasing approach that encourages the delivery of brownfield sites first.</p> <p>Q21. The world of work is likely to see revolutionary changes over the plan period, with technology changing whether, where and how we work. The plan and evidence base does not recognise the likely changes. The plan needs to look ahead to prepare for the workplaces and lifestyles of the future. This is likely to include more working from home in the rural areas, and greater opportunities for employment in the rural leisure industry. The nationally important resource of the Chilterns AONB provides incredible opportunities</p>	
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	<p>for sustainable tourism and health and wellbeing, making the protection of its natural beauty for the future even more important.</p> <p>Q23. Retailing has changed. Technology and delivery systems are likely to bring further revolutionary changes to retailing over the plan period. The plan should look ahead to prepare for the changes, which are likely to mean a reduced need for conventional large format retail floorspace. Flexible approaches such as co-location of village services (shop/post office/pub/cafe/delivery point) may help retain facilities in the rural areas.</p> <p>Q24. CCB would support a stronger rural visitor economy and the provision of further facilities and businesses catering for visitors, as long as they are sympathetically designed and sited, and activities are appropriate to the area and do not harm its beauty and tranquillity. Visiting the AONB improves wellbeing and enjoyment, and many parts of Dacorum have the benefit of the AONB on their doorstep. Visiting encourages people to care for and protect the AONB. The policy should recognise areas of visitor pressure where numbers are impacting on the natural environment, and seek to avoid further concentration of visitors here. Further advice is available in the Understanding and Enjoyment chapter of the Chilterns AONB Management Plan.</p> <p>Q25. CCB supports the recognition of a hierarchy of designations, with AONB as a national landscape designation, protected for the nation. The relative importance graphic demonstrates well the "great weight" that should be accorded to conserving and enhancing the AONB (NPPF para 115).The recognition of a duty towards the AONB is also welcomed (Section 85 of the Countryside and Rights of Way Act 2000).The proposal to review the Chilterns AONB policy provides a good opportunity to refresh and update the policy. To ensure latest best practice and for consistency across the AONB, the CCB recommends incorporating into the next stage of the plan the model policy for the Chilterns AONB prepared by the CCB with the officers from across the local authorities of the Chilterns, including Dacorum. The model policy is available at <a href="http://www.chilternsaonb.org/conservation-board/planning-development/planning-training">http://www.chilternsaonb.org/conservation-board/planning-development/planning-training</a></p> <p>Q26 Support approach to historic environment</p> <p>Q27. 1.The CCB would welcome greater emphasis on chalk streams, paragraphs 8.3.2 and 8.3.9 need joining up. The River Bulbourne, River Gade &amp; River Ver are chalk streams, a globally rare habitat and a characteristic feature of the Chilterns landscape. 85% of the world’s chalk streams are found in England. Chalk streams are home to some of our most threatened plants and animals. Like all the other chalk streams in the Chilterns, the Rivers Gade, Bulbourne and Ver are currently failing EU Water Framework Directive objectives, with low flows being cited as a major causal factor for these failures. Studies by the Environment Agency and water companies have shown that abstraction for public water supply is a major factor in the chronic low flows that these rivers are experiencing. Despite past abstraction reduction in the Bulbourne and Ver valleys and a planned reduction in the Gade valley aimed at reducing the pressure on the rivers, they remain vulnerable to low flows. The impact on Chilterns chalk streams of development</p>	
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	<p>proposals must be urgently and thoroughly assessed (cumulatively, not just Dacorum alone) and may form a cap on the capacity to accommodate development. A lack of alternative sources of water at strategic scale will prevent the impact of increased demand at a local level from being offset. For further information please see the Chilterns Chalk Streams Project <a href="http://www.chilternsaonb.org/about-chilterns/chalk-streams.html">http://www.chilternsaonb.org/about-chilterns/chalk-streams.html</a></p> <p>2.The recognition of the importance of dark skies and tranquillity in the Chilterns AONB at para 8.3.8 is welcomed, this should be addressed through policy.</p> <p>Q28. Some further dimensions to add on climate change are the importance of protecting the natural environment as a carbon store. The policy could recognise the natural capital provided by soils and trees, especially the ancient woodlands of the Chilterns AONB. Encouraging sustainable farming, forestry and land management practice can help with climate change mitigation and adaptation. The policy could also encourage the local food industry and promote travel by sustainable modes.</p> <p>Q30. This section could recognise the health and wellbeing benefits of outdoor exercise and volunteering. The Chilterns AONB is a great resource for mental and physical wellbeing.</p> <p>Q31 This GI section should recognise the importance of ecological corridors and networks in green infrastructure. It could reference the Lawton report (<a href="https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today">https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today</a>) and also the Chilterns AONB Management Plan's biodiversity aim: "Enhance ecological networks so that they are bigger, better, more resilient, joined up and dynamic" (see <a href="http://www.chilternsaonb.org/conservation-board/management-plan.html">http://www.chilternsaonb.org/conservation-board/management-plan.html</a>).With much of Dacorum's population on the doorstep of the Chilterns AONB, connections into the vast public rights of way network of the Chilterns (including the Ridgeway National Trail) should be cherished and invested in.</p> <p>Q33. In an area which is covered by important designations, like the Chilterns AONB, the process of establishing a housing figure in a local plan is supposed to involve OAN plus a process of considering constraints, which may well lower the appropriate amount of growth. The Council has failed to carry out that process and is simply accepting pure OAN, unmoderated by constraints. This does not match the Issues and Options document's own cog diagram on page 45, and it does not comply with the NPPF which explains at para 14 that Local Plans should meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and unless specific policies in the Framework indicate development should be restricted. Examples of areas where development should be restricted are listed in footnote 9 of the NPPF. They are abundant in Dacorum BC, where there are Special Areas of Conservation, many sites designated as Sites of Special Scientific Interest, significant areas of land designated as Green Belt and Area of Outstanding Natural Beauty, designated heritage assets; and locations at risk of flooding.</p> <p>The capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number.</p>	
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	<p>The question should not be which alternative OAN figure should the Council adopt, but how much of that growth can be accommodated while delivering sustainable development and protecting features of acknowledged importance like the Chilterns AONB, nationally protected as one of the country's finest landscapes, and with the same level of protection (the highest) as National Parks (NPPF para 115). The growth level should be informed by sustainability appraisal and assessment of the cumulative effects on development on the Chilterns AONB, including effects on natural beauty, ecology, habitat fragmentation, air quality, tranquillity, water abstraction from chalk streams, visitor pressure etc. Please see the recently published guidance from the Chilterns Conservation Board: Position Statement on Cumulative Impacts of Developments on the Chilterns AONB which should be of assistance in identifying effects and assessing them, it is available online at <a href="http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html">http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html</a></p> <p>Q34&amp;35. The Urban Capacity option, plus any greenfield sites that do not harm important designations like the AONB (or its setting) would appear a sensible approach</p> <p>Q36. CCB considers that there is a crucial locational principle missing here: "Conserve and enhance the Chilterns AONB and its setting"</p> <p>Q37. Given the high level of constraint and environmental capacity issues in Dacorum, the option of accommodating some growth in other less constrained Council areas should not be rejected. Some broader strategic planning and regional planning would help ensure that the nationally protected landscape of the Chilterns AONB is conserved and enhanced. The Oxford- Cambridge growth corridor with potentially one million additional homes will reshape the strategic geography of the region and could move the locus of growth northwards, which should take the pressure off land to the south during this plan period.</p> <p>Q14. The proposed policy on the "Water environment: lakes, reservoirs, ponds and canals" should also refer to rivers and to environmentally sustainable levels of water abstraction.</p> <p>Q39. CCB objects to Option 1A because it potentially involves major development in the Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8) which the NPPF para 116 states should be refused except in exceptional circumstances and where it can be demonstrated it is in the public interest. Meeting housing figures is not an exceptional circumstance, there are alternatives in the housing market area not in the AONB. Development of these greenfield sites in the AONB would not conserve and enhance the natural beauty of the AONB or meet the vision. This option also involves developing multiple sites in the Setting of the AONB at Hemel Hempstead, Tring and Berkhamsted, with considerable cumulative encroachment up to AONB boundaries on multiple sides of these settlements. This is likely to harm the setting of the Chilterns AONB. Other options avoid this and perform better. The statutory Chilterns AONB Management Plan 2014-2018 explains how developments outside the AONB but in its setting can affect the AONB (see Vision, Policies L4, L5, L7, L8, D8, D9 and Position</p>	
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	<p>Statement on Development Affecting the Setting of the AONB). Adverse impacts might not be visual. The special qualities of the Chilterns AONB include tranquillity. A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB. The Council must give great weight to the Chilterns AONB (NPPF para 115) and is under a legal duty to have regard to the purpose of conserving and enhancing the natural beauty of the Chilterns AONB (CRoW Act 2000 section 85) The Chilterns AONB is nationally protected as one of the country's finest landscapes, and has the same level of protection (the highest) as National Parks (NPPF para 115).The location of growth should be informed by sustainability appraisal and assessment of the cumulative effects on development on the Chilterns AONB, including effects on natural beauty, ecology, habitat fragmentation, air quality, tranquillity, water abstraction from chalk streams, visitor pressure etc. Please see the recently published guidance from CCB's Position Statement on Cumulative Impacts of Developments on the Chilterns AONB which should be of assistance in identifying effects and assessing them.</p> <p>Q40. Yes, (of those presented) Option 1B is likely to have the least adverse impact on the Chilterns AONB and its setting</p> <p>Q41. CCB objects to Option 1C because it potentially involves major development in the Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8).This option also involves developing multiple sites in the Setting of the AONB at Tring, Berkhamsted and Markyate with considerable cumulative encroachment up to AONB boundaries on multiple sides of these settlements. This is likely to harm the setting of the Chilterns AONB. Other options avoid this and perform better.</p> <p>Q42. CCB objects to Option 2A because it potentially involves major development in the Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8) which the NPPF para 116 states should be refused except in exceptional circumstances and where it can be demonstrated it is in the public interest. This option also involves developing multiple sites in the Setting of the AONB at Hemel Hempstead, Tring and Berkhamsted with considerable cumulative encroachment up to AONB boundaries on multiple sides of these settlements. This is likely to harm the setting of the Chilterns AONB. Other options avoid this and perform better</p> <p>Q43. CCB objects to Option 2B because it potentially involves major development in the Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8).This option also involves developing multiple sites in the Setting of the AONB at Hemel Hempstead, Tring and Berkhamsted with considerable cumulative encroachment up to AONB boundaries on multiple sides of these settlements. This is likely to harm the setting of the Chilterns AONB. Other options avoid this and perform better.</p> <p>Q44. CCB objects to Option 2C because it potentially involves major development in the Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8).This option also involves developing multiple sites in the Setting of the AONB at Hemel Hempstead, Tring, Berkhamsted and Markyate, and 155 homes at unspecified locations in the rest of the borough (potentially AONB or AONB setting).There would be considerable cumulative encroachment up</p>	
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	<p>to AONB boundaries on multiple sides of these settlements. This is likely to harm the setting of the Chilterns AONB. Other options avoid this and perform better.</p> <p>Q45. CCB objects to Option 3 because it potentially involves major development in the Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8). This option also involves developing multiple sites in the Setting of the AONB at Hemel Hempstead, Tring, Berkhamsted and Markyate, and 608 homes at unspecified locations in the rest of the borough (potentially AONB or AONB setting). There would be considerable cumulative encroachment up to AONB boundaries on multiple sides of these settlements. This is likely to harm the setting of the Chilterns AONB. Other options avoid this and perform better.</p> <p>Q46. CCB objects to the allocation of sites in the AONB Tr-h4 and Be-h8 and makes a holding objection to all the sites in the setting of the Chilterns AONB, pending proper assessment of the impact of developing the sites on the AONB: HEMEL HEMPSTEAD HH-h1a North Hemel Hempstead (Phase 1) HH-h1b North Hemel Hempstead (Phases 1 and 2) BERKHAMSTED Be-h3 Land at Ivy House Lane Be-h4 Land between Durrants Lane / Bell Lane / Darr's Lane (two sites) Be-h5 Land at Lockfield, New Road, Northchurch Be-h7 Land at Bank Mill Lane Be-h8 Berkhamsted Golf Range, The Brickworks, Spring Garden Lane (in Chilterns AONB) TRING Tr-h1 Land to the north of Station Road Tr-h2 Land west of Marshcroft Lane Tr-h3 Land at Ickniel Way / Grove Road (New Mill) Tr-h4 Land at Cow Lane / Station Road (in Chilterns AONB) Tr-h5 Land at Dunsley Farm, London Road Tr-h6 Land north of Ickniel Way (Waterside Way) MARKYATE My-h1 Land south of Markyate My-h2 Land at Pickford Road OTHER SETTLEMENTS O-h1 Land at Old Kiln Meadow, Water End Road, Potten End</p> <p>There are gaps in the evidence base for the Local Plan on assessing impacts on the AONB..The emphasis of the work so far is the Green Belt. Landscape is a late add-on to the Green Belt study, and shows little understanding of AONB impacts. There is not even a map showing the AONB boundary in the Arup work. The landscape work at a site level is mainly desk based and not detailed enough. It is overly focussed on whether the land parcel exhibits the special qualities of the AONB, which is not what Government policy or legislation says: Countryside and Rights of Way Act 2000 sec 85: "have regard to the purpose of conserving and enhancing the natural beauty of the AONB" - all of it, not just the subset of areas which happen to contain the special qualities. Furthermore not all AONB impact are visual or come under the heading of landscape eg effects on tranquillity, ecology, air pollution, dark skies.The message from the Planning Inspector re: the proposed Dacorum BC Site Allocation in the AONB west of Tring needs to be heeded.</p> <p>The Schedule of Site Appraisals Sustainability Appraisal Working Note is flawed because being in the setting of the AONB has been given no greater weight than sites outside the AONB setting. For example, sensitive AONB setting sites like Be-h3 Land at Ivy House Lane has been scored exactly the same (one orange cross: "the option is likely to have a negative effect which is not significant") under SA9 Landscape as sites further distant from the AONB at Kings Langley or Bovingdon. The Chilterns Conservation Board is</p>	
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		willing to help with a brief for a study of the impacts of proposed allocations on the Chilterns AONB.	
Goring NP Pre-submission Goring NP	SODC	<p>1. The CCB supports the landscape capacity approach taken by the neighbourhood plan. We are aware that the South Oxfordshire Local Plan Oct 2017 Policy H4 proposes a higher requirement for Goring of 140 dwellings, but the CCB does not consider than any more than the 94 dwellings allocated can be accommodated without detriment. Indeed, the Board is concerned that development on the GNP3 and GNP6 sites does not conserve and enhance the natural beauty of the AONB, and could constitute major development in the AONB. The Board notes that the South Oxfordshire Local Plan lower case text sets out that “the level of growth proposed should be evidenced within the Neighbourhood Development Plan with local communities helping to shape the development of their village”. You have followed that instruction and allocated as much as you could given the geography of Goring falling entirely within the nationally protected landscape of the Chilterns AONB, in the setting of the North Wessex Downs AONB and as a River Thames riverside village in the flood zone.</p> <p>2. As you know, the plan must give great weight to the AONB (NPPF para 115) and decision makers (both Goring Parish Council, SODC and the CCB) are under a legal 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 AONB. This must shape your decisions.</p> <p>3. This means avoiding direct harm (e.g. greenfield sites in the AONB) and indirect harm (e.g. ensuring that development does not generating traffic though the AONB, and that tranquillity and dark skies of the Chilterns are maintained). The harm should be assessed in the SA both individually (each site or policy proposal) and cumulatively (sites and proposals together). The CCB has published a new guide on Cumulative Impacts of Development on the AONB<sup>5</sup>.</p> <p>4. There is much to support in your plan. The CCB:</p> <ul style="list-style-type: none"> <li>• Supports the allocations being landscape-capacity led and based on landscape evidence;</li> <li>• Supports objective 02 on avoiding sprawl into AONB countryside;</li> <li>• Supports the approach of allocating several smaller sites (single large sites would certainly fall into the major development category);</li> <li>• Supports the care given to creating a new defensible edge to the village;</li> </ul>	21.12.17

<sup>5</sup> Chilterns Conservation Board – Position Statement on the Cumulative Impacts of Development on the Chilterns AONB, available at <http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html>



		<ul style="list-style-type: none"> <li>• Supports the detailed thinking that has gone into site-specific policy requirements, given the highly sensitive nature of the village, entirely washed over by the AONB;</li> <li>• Supports the focus on smaller units (1, 2 and 3 bed) and aiming to support first time buyers and downsizers, given Goring’s ageing demographic and the large proportion of detached housing in the existing stock;</li> <li>• Supports Policy 02 Affordable Housing using the lower threshold of 6 or more dwellings in the AONB (which the emerging South Oxfordshire Local Plan policy H6 also uses in the AONB); the Board agrees it is appropriate for that affordable housing to be delivered on-site in a larger village context; and</li> <li>• Supports the use of bespoke policies (Policies 09-12) to protect the different landscapes character types of the AONB in Goring parish.</li> </ul> <p><b>Specific comments and recommended changes</b></p> <p>5. Use paragraph numbers so that your plan can be referred to easily and accurately when it becomes part of the development plan.</p> <p>6. Add to section 3.2 on strategic issues the issue of Major Development in the AONB. Issue 1 should refer to national policy which does not allow a neighbourhood plan to “ignore the constraints of the AONB and prioritise housing development”. The National Planning Policy Framework<sup>6</sup> is clear that:</p> <p><b>Paragraph 115</b> <u>Great weight</u> should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.</p> <p><b>Paragraph 116</b> <u>Planning permission should be refused for major developments</u> in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> <li>• the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</li> <li>• the cost of, and scope for, developing elsewhere</li> </ul>	
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<sup>6</sup> <http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/11-conserving-and-enhancing-the-natural-environment/>

		<p>outside the designated area, or meeting the need for it in some other way; and</p> <ul style="list-style-type: none"> <li>• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”</li> </ul> <p>The plan currently does not refer to the issue of major development in the AONB and does not assess the allocated sites against whether they would constitute major development.</p> <p>7. While supporting Policy 04 on exceptions sites, it would be wise to add ‘landscape’ to criterion (iii), especially given the visual impact of the Icen Close development in long range AONB views.</p> <p>8. In Policy 08 it would help to define infill, for example referring to the SODC definition in policy H16: e.g. “infill development is defined as the filling of a small gap in an otherwise continuous built-up frontage or on other sites within Goring where the site is closely surrounded by buildings”. The scale of infill allowed by the policy is lower than in the emerging South Oxfordshire Local Plan. The CCB suggests you add justification for this e.g. that this scale is appropriate because of the village’s constraints (AONB, Conservation Area etc) and small-scale infill developments are more likely to be successfully integrated into the village and landscape.</p> <p>9. A replacement dwellings and conversions policy might also be usefully added after the infill policy. There are some areas of Goring and Cleeve where the architecture is not as meritorious as the more historic parts, and where some replacement and redevelopment could enhance the area. Sometimes a net gain in housing could be achieved by replacing a single dwelling on a large plot with a number of small homes. However, designs of either single (‘grand designs’) or multiple homes that are oversized or out of keeping could be harmful. A policy could steer on locally appropriate design that would complement the parish. In the parts of the parish outside the settlement (remember that policies apply to the whole Goring neighbourhood area unless you specify otherwise), particular care is needed with replacements and conversions in order to protect the AONB.</p> <p>10. On site selection, the CCB supports the rejection of sites like those between Goring and Gatehampton in the Chilterns escarpment landscape character area, the most visually sensitive character area in the parish. Development on these sites would seriously harm the AONB, the enjoyment of key walks and important views to and from higher land on the chalk escarpment. The iconic Goring Gap must be preserved by keeping development on the</p>	
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		<p>lower land to maintain the setting of Goring as a riverside village in the valley, surrounded by magnificent undeveloped chalk hills. This allows viewers to read the geology and appreciate the very significant geological event caused by the melting icesheet which cut the Goring Gap, and means the River Thames now flows southeast and our capital city London is where it is today.</p> <p>11. GNP2 Icknield Road has a short stretch of open boundary at the north east to the dry valley beyond. This would need careful planting to screening the development and provide a defensible boundary from future development pressure into open countryside.</p> <p>12. GNP3 Manor Road, the CCB considers that this allocation would not conserve and enhance the Chilterns AONB. This is a sensitive site in good condition, beyond the built-up area of Goring, with a special arcadian quality and visible from the public rights of way network connecting to the Thames Path National Trail. It is a valued landscape. The Bramwell report identifies a “high adverse” impact on landscape character:</p> <p>“Impact will result in the loss of this greenfield site and could easily have an effect on the mature trees along the boundaries, particularly the trees along Manor Road (including their root protection areas). Any development within the root protection zones of the trees, whether within the development site itself or along Manor Road, for example, engineering works to improve access, is likely to result in damage to their health, threaten their longevity, and ultimately result in their loss, with a consequential loss of character. The proposals are very damaging to the landscape in that they create a landscape whose character:</p> <ul style="list-style-type: none"> <li>• Is at considerable variance with the layout, mix, scale and appearance of the landscape.</li> <li>• Will introduce elements considered to be substantially uncharacteristic of the attributes of the receiving landscape.</li> <li>• Will be substantially damaging to a high quality or highly vulnerable landscape, causing it to change and be considerably diminished in quality.</li> <li>• Destroys existing sense of place.</li> <li>• Cannot be adequately mitigated.”</li> </ul> <p>The landscape effect, both before/ without mitigation and after mitigation, is ranked in the Bramwell report as ‘major’. It is unclear therefore why the site is allocated.</p> <p>13. The proposal to raise up the ground level under the dwellings could exacerbate their visibility and give them an unnatural appearance in the landscape. Further details are needed on this point. Also a site layout plan showing the</p>	
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		<p>development area and areas where no development should take place could assist.</p> <p>14. The CCB objected to the application ref P15/S3483/O in 2015 and the appeal was dismissed in 2017, with the Inspector finding this to be major development in the AONB. The policy’s approach of allocating the site for a ‘minimum’ of 20 new homes means that a scheme like the appeal scheme for 35 could come forward, which we know from the Inspector is major development in the AONB which that should be refused. The Inspector stated “I conclude that the proposed development would result in material harm to the rural character, landscape setting of the village and therefore the natural beauty of the Chilterns Area of Outstanding Natural Beauty, including the effect on trees. Paragraph 14 of the Framework advises planning permission should be granted unless specific policies indicate development should be restricted. The proposal would conflict with specific policies in the Framework which indicate that development should be restricted, in particular those related to AONB’s, and hence permission should not be granted.” What has changed?</p> <p>15. GNP6 Springhill Farm is also potentially major development in the AONB because of its size and topography. Visible in longer distance AONB views (including from higher land in the North Wessex Downs AONB), this is an area of the Central Vale Fringes Landscape Character Area with an “open rolling downs” landscape type. There is a real danger that taking a bite out of this field and opening up an access will lead to pressure for further northwards expansion of Goring towards South Stoke. Development should not breach the ridge and spill over onto the main sweep of open rolling downland, this would be seriously harmful to both AONBs. The policy’s approach of keeping development within the 65m AOD contour may assist (perhaps this should this read ‘keep rooflines below the 65m contour’ instead of ‘dwellings must not be built above the 65m contour’). It is important to emphasise that creating a defensible barrier to further northward sprawl is essential. The CCB recommends no housing development in the triangle area as this area is visually prominent, there is no reason to add to the ribbon development along Wallingford Road, and the gain of 4 houses would not justify harm to the view.</p> <p>16. Policy GNP6 should require that the traditional orchard is restored and expanded not just protected. The manège has already destroyed part the orchard. The Traditional Orchard is a Priority Habitat. As well as their biodiversity value they as they are part of the Chilterns rural scene which should not be lost or forgotten. Traditional Orchards are covered in the AONB Management Plan as follows:</p> <p><i>“Policy L1 The overall identity and character of the Chilterns</i></p>	
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		<p><i>should be recognised and managed positively.</i></p> <p><i>The main characteristics of the Chilterns landscape have been created by human intervention. In most cases they need to be managed actively in order to retain those qualities or restore natural characteristics which are in decline e.g. chalk downland, hedgerows, ancient woodlands, chalk streams, traditional cherry and apple orchards.”</i></p> <p>17. GNP10 the Board supports the allocation of this site, with care over the building design this could enhance the conservation area and AONB. The building heights should be carefully controlled so that new buildings are in keeping with the attractive surrounding of the High Street, and should not replicate the height of the existing large building. We suggest setting a maximum ridge height or number of storeys in the policy. You could also consider making use of the village centre location by having a mixed-use development with commercial/ retail/ community use of the ground floor and residential above.</p> <p>18. GNP2, GNP3 and GNP6 should require Landscape and Visual Impact Assessments to accompany the planning applications.</p> <p>19. GNP2, GNP3, GNP6, GNP10 and Policy 19 correct name of document from “Chilterns Conservation Board Design Guide” to “Chilterns Buildings Design Guide”.</p> <p>20. The plan contains an AONB objective, but not a general AONB policy. The CCB has developed a model policy (see Appendix 3). It is designed for local plans but you could consider incorporating it or some wording from it.</p> <p>21. The AONB landscape policies 09-12 and map could refer more specifically to the landscape character areas and types as set out in the South Oxfordshire landscape assessment (Atlantic Consultants) or the more recent synthesis of that original fieldwork in the new draft South Oxfordshire Landscape Character Assessment (2017). It would help to add shaded areas to the map showing the landscape character areas to which the policies 09-12 apply as well as the photographic flags.</p> <p>22. Policies 09-12 on the different landscapes character types of the AONB in Goring parish are welcomed. However the phrasing “should be conserved and enhanced wherever policy” is not strong enough. It should not be optional, please delete “wherever possible”. See for example the approach of the AONB model policy in appendix 3 (‘will only be granted when it 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’).</p>	
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		<p>23. Policy 13 should also be stronger and refer to a “net gain” for biodiversity (as set out in NPPF para 109), not “no net loss and preferably a net increase”.</p> <p>24. The Board is grateful for the opportunity to make these written comments and wishes Goring neighbourhood plan group well in finalising the plan for submission and examination. If we can be of further assistance please contact us.</p>	
<p>Vale of Aylesbury Local Plan Reg 19 publication</p>	<p>AVDC</p>	<p><b>SUPPORT I6 Telecommunications</b>                  The Boards supports this policy to limit the damaging landscape impacts which can arise from telecommunications development. The policy could usefully be expanded to cover similar impacts from other forms of utilities e.g. overhead electricity lines, associated poles or pylons and their ancillary buildings, and high rail and road structures such as overhead line equipment for rail electrification, and traffic cameras and overhead gantries. HS2 and East West Rail are likely to involve electrification equipment which can be highly detrimental to the landscape (as it has in the AONB at Goring on the Great Western Railway)</p> <p><b>SUPPORT I3 Community facilities and assets of community value</b>                  The Board supports these policy controls on loss of facilities like pubs and villages shops, which are crucial both to local people and visitors to the Chilterns AONB.</p> <p><b>OBJECT C3 Renewable Energy</b>                  The policy could usefully refer to noise, motion, glint and glare as types of impact as well as visual impact.</p> <p><b>OBJECT 10.6</b>                  The Board supports the policy's approach of retaining agricultural buildings for rural enterprise, with stricter controls on residential use. In paragraph 10.6 a third reference could be added as follows: "AVDC Design Guide for Conversion of Traditional Farm Buildings and Conversion of Listed Historic Farm Buildings, and in the AONB, to the Chilterns Buildings Design Guide."</p> <p><b>OBJECT NE4 The Chilterns AONB and setting</b>                  The CCB supports and welcomes the inclusion of this policy, which is based on joint work to create a consistent Chilterns-wide AONB policy carried out with our Planning Forum of local policy officers. However some changes have been introduced which have made NE4 quite hard to follow e.g. introducing a distinction between major and non-major development with only criteria a, d and e applying to non-major development. If continuing this approach, it would be better if f-m applied to all development, whilst removing the requirement for every non-major development to carry out landscape and visual impact assessment. Change to plan: Either switch to the AONB model policy (our preferred approach) or adjust the policy text to address the current complications. This could be achieved by changing the second half of the policy to “Actions to conserve and enhance the AONB shall focus upon: (list as before)</p>	<p>14.12.17</p>

	<p>then new criterion (n) and in the case of major development proposals, shall be informed by landscape and visual impact assessment, having considered all relevant landscape character assessments.</p> <p><b>OBJECT 9.21</b>                  Various minor corrections are needed to the supporting text, which looks dated (e.g. refers to the Shadow Chilterns Conservation Board which was replaced by the Chilterns Conservation Board in 2004). The Chilterns AONB model policy supporting text might help improve these paragraphs</p> <p><b>OBJECT NE3 River and stream corridors</b>                  The CCB supports this policy but would like to see at least a 10m ecological buffer.</p> <p><b>OBJECT NE2 Biodiversity and geodiversity</b>                  CCB supports the policy approach of biodiversity net gain and use of metrics. However the policy should not extend to the principle of mitigation for harm to the Chilterns Beechwoods SAC or SSSIs, which are irreplaceable, as are ancient woodlands and veteran trees (as stated in para 9.2 of the Local Plan). Add reference to ancient woodland and veteran trees. Delete mitigation options for SAC and SSSI. Consider bringing together NE1 and NE2, these policies are muddled,</p> <p><b>OBJECT NE1 Protected sites</b>                  The title is unclear, it could refer to other protected sites eg historic environment or protected employment sites. NE1 does not reflect the increased weight being given to ancient woodland and veteran trees.                  NE1 should not just be about SSSIs, ancient woodland and ancient trees, it should establish a hierarchy including European sites (SACs) and assign them appropriate weight, in order to follow the advice in NPPF Para 113 "Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance" Alter policy title to "NE1 Protected biodiversity sites" Reduce duplication in the policy.                  Toughen the stance on ancient woodland and ancient trees, they are irreplaceable. Delete "the impacts to the site are clearly outweighed by the benefits of the development."</p> <p><b>OBJECT 8.43</b>                  The paragraph should also refer to the AONB and to the well respected Chilterns Buildings Design Guide and supplementary technical notes on brick, flint and roofing materials.</p> <p><b>SUPPORT - BE1 Heritage Assets</b>  <b>SUPPORT T6 Footpaths and cycle routes</b></p>	
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	<p>OBJECT 6.40 Add reference as follows: “Proposals should refer to the AVDC Design Guide for New Buildings in the Countryside, and in the AONB to the Chilterns Buildings Design Guide”</p> <p>OBJECT E1 Protection of key employment sites E1 gives blanket support to B1 (light industrial), B2 (general industrial), B8 (storage and distribution) applications at key employment sites. Since the list of key employment sites includes sites which are visible from the escarpment of the Chilterns AONB (e.g. Arla/ Woodlands, Pitstone Green Business Park and Triangle Business Park) a restriction 'subject to meeting other policies in the plan' could usefully be added. This would help safeguard from adverse impacts on the AONB (eg visual impacts or increases in traffic generation through the AONB), and require careful design (e.g. green roofs, reductions in height and bulk of individual buildings). Change to plan Add to a) as follows: “Within key employment sites (listed above and identified on the Policies Map) applications for B1 (light industrial), B2 (general industrial), B8 (storage and distribution) will be permitted subject to meeting other policies in the plan”.</p> <p>SUPPORT H2 Rural exception sites The CCB supports this policy. The Board has supported and will continue to support rural exceptions schemes to meet identified local housing needs. However, changes are needed to Policies D2 or else there are very unlikely to be any rural exceptions sites in larger or medium villages because they allow new greenfield housing to be located “within or adjacent to the existing developed footprint of the settlement”. For a rural exceptions policy to work, there has to be strict policy control on greenfield village expansions, which the RES is then an exception to.</p> <p>OBJECT H1 Affordable housing The policy should be amended to secure affordable housing contributions on smaller sites in AONBs and Designated Rural Areas, in line with the latest guidance (See Government Planning Practice Guidance on Planning Obligations para 017). The smaller site provisions apply to rural areas designated under s157 of the 1985 Housing Act, including National Parks, AONBs and Designated Rural Areas, which includes many parishes in Aylesbury Vale (see lists available here <a href="http://www.legislation.gov.uk/ukxi/1997/625/schedule/1/made%20of%20whole%20parishes%20covered%20eg%20Ivinghoe,%20Edlesborough">www.legislation.gov.uk/ukxi/1997/625/schedule/1/made of whole parishes covered eg Ivinghoe, Edlesborough</a>, and here <a href="http://www.legislation.gov.uk/ukxi/1997/625/schedule/2/made%20of%20mapped%20part%20parishes%20including%20Haddenham,%20Aston%20Clinton,%20Wendover%20etc">www.legislation.gov.uk/ukxi/1997/625/schedule/2/made of mapped part parishes including Haddenham, Aston Clinton, Wendover etc</a>). The South Oxfordshire emerging local plan takes this approach. Change to plan Suggested new asterisk section to the policy: “* except in the Chilterns AONB and Designated Rural Areas where affordable housing at x% will be required on sites of 6 or more dwellings.”</p> <p>OBJECT D3 Housing development at smaller villages The footnote is liable to misinterpretation because of the use of 'excludes' and then 'includes' to explain what is excluded.</p>	
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	<p>OBJECT D2 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages</p> <p>The 'within or adjacent to the existing developed footprint of the settlement' is particularly problematic, suggest delete 'or adjacent'. Otherwise once a greenfield development has been allowed, can another one take place on the greenfield land beyond that? What control is there over incremental creep outwards of villages, and how will cumulative effects be taken into account? How will rural exceptions sites ever be delivered if land adjacent to villages is allowed for market housing? If there is slow delivery of an allocation there should be no expectation that a site in the AONB or its setting is released. Change to plan Delete "or adjacent" Also the footnote is liable to misinterpretation because of the use of 'excludes' and then 'includes' to explain what is excluded, suggested change as follows: "the existing developed footprint is defined as the continuous built form of the village, and excludes individual buildings and groups of dispersed buildings. This means excluding former agricultural barns that have been converted, agricultural buildings and associated land on the edge of the village and gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where the land relates more to the surrounding countryside than to the built up area of the village."</p> <p>SUPPORT RAF Halton</p> <p>The CCB does not object to the re-use of this previously developed site provided that full account and care is taken with the setting of the Chilterns AONB, which wraps around two sides of this large site. The woodland setting helps with reducing harm to AONB views (unlike RAF Halton Airfield where the Board would object to development). Please see our Position Statement on Development Affecting the Setting of the Chilterns AONB. Particular care will be needed over design, heights, external lighting and traffic generation, as well as protecting the site's rich heritage and existing trees.</p> <p>SUPPORT Aylesbury Linear Park Green Infrastructure Proposals Map</p> <p>The CCB supports the emphasis given to green infrastructure in the Aylesbury proposals. More investment could be made into recreational links to the Chilterns AONB. However the linear park map fails to label the Ridgeway National Trail which runs along the Chilterns escarpment and other important Chilterns routes including the Chiltern Link and the Chilterns Cycleway. The green infrastructure network should link Aylesbury to these strategic walking and cycling routes. For a map of the Ridgeway please see <a href="http://www.chilternsaonb.org/explore-enjoy/interactive-map.html#215">http://www.chilternsaonb.org/explore-enjoy/interactive-map.html#215</a> and for other routes please see <a href="http://www.chilternsaonb.org/explore-enjoy/walks-rides.html">www.chilternsaonb.org/explore-enjoy/walks-rides.html</a> or contact the CCB.</p> <p>OBJECT D-AGT6 Kingsbrook, D-AGT4 Aylesbury south of A41, D-AGT3 Aylesbury north of A41, D-AGT2 South west Aylesbury, D-AGT1 South Aylesbury</p>	
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	<p>This is looking one way only, views to the Chilterns AONB from the site. More important are views from the Chilterns AONB towards Aylesbury. Very careful consideration needs to be exercised for expansion below the scarp slope of the Chilterns. The views out of the AONB from key e.g. from Coombe Hill and along the Ridgeway National Trail, are some of the most important views in the Chilterns, central to the public's recreational enjoyment of the AONB. These are nationally important places on a National Trail, which should be protected for current and future generations to enjoy. Amend to: "The development should be designed using a landscape-led approach including consideration of the long-distance views to and from the AONB. This should be informed by a Landscape and Visual Impact Assessment prepared in line with the latest Landscape Institute Guidelines for Landscape and Visual Impact Assessment"</p> <p>OBJECT 4.77, 4.63, 4.47, 4.38, 4.37</p> <p>Refer also to long distance views from the Chilterns AONB. Amend to: The site layout and design should also take account of key long-distance views to and from the Chiltern Hills.</p> <p>SUPPORT 4.3</p> <p>It is good that the plan recognises this exemplar rural setting. However extreme care will be needed to ensure that the development of Aylesbury towards the Chilterns escarpment does not undermine that special character or harm the natural beauty of the Chilterns AONB.</p> <p>OBJECT S9 Monitoring and review</p> <p>The CCB is concerned that this policy provides so readily for the undermining of the development plan. Development should be planned. It should not be the case that a single policy becoming out of date because of a national policy change, or a single indicator shown not to be not achieving the Plan's objectives, or the slow delivery of a single site in the trajectory, bins the whole plan. Change to plan Alter to: "The Plan may be reviewed, or proposals for alternative sustainable sites considered favourably (subject to compliance with other policies in the Plan), if serious shortcomings arise such as: a. Site allocations are not coming forward at the rate anticipated in the housing trajectory, leading to a serious under-delivery of rates expected in the Plan b. Evidence established through another local planning authority's Local Plan process show that its unmet need can only be accommodated in Aylesbury Vale c. Changes in national planning policy and guidance that mean that one or more of the policies in the Plan are not up to date (only those policies will be affected), or d. Evidence in the monitoring report shows that one or more of the policies in the plan are significantly running contrary to achieving the Plan's objectives or to effective planning in the district (in this case the plan will be reviewed).</p> <p>OBJECT - 3.82</p> <p>The CCB disagrees that the majority of windfall sites will be greenfield going forward. The NPPF glossary defines windfall sites as "Sites which have not been specifically identified as available in</p>	
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	<p>the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available". Far more brownfield land and building conversions may emerge for residential reuse given the new flexibilities allowed by the GDPO and the Council's participation in the Government pilot scheme giving automatic permission for some brownfield sites. Change to plan: Delete "the majority of windfall sites are greenfield".</p> <p><b>OBJECT 3.83</b>          It is unclear why windfalls are only being counted for small sites (4 or fewer) when the NPPF para 48 and NPPG para 24 makes no restriction that windfalls cannot be large sites too. The 962 windfall allowance for the plan period is a low estimate given permitted development changes in the GPDO 2015, the introduction of automatic planning permission for some brownfield sites in the Government pilot scheme and the digital revolution changing how we work and shop, freeing up buildings and land. Far more brownfield land and building conversions may emerge for residential reuse. Change to plan: Change the threshold to allow for large site windfalls as well as those of 4 dwellings or fewer</p> <p><b>SUPPORT S7 Previously developed land</b>          The CCB supports the policy which encourages the re-use of previously developed land in sustainable locations</p> <p><b>SUPPORT 3.32</b>          The CCB supports the Council's decision to drop the greenfield site north of Wendover, this was also in the setting of the Chilterns AONB. RAF Halton is a better option. Both together would have a negative cumulative effect.</p> <p><b>OBJECT Table 2 Proposed settlement hierarchy and housing development</b>          Settlement Hierarchy should make a distinction between AONB and non-AONB villages. Settlements in the AONB or its setting should have special consideration e.g. Ivinghoe, Edlesborough, Pitstone, Aston Clinton, Marsworth, Cheddington, Stoke Mandeville and Weston Turville. More weight should be given to population size as well as facilities e.g. &gt;2000 population plus key criteria. It does not make sense for Ivinghoe, a village of only 722 people and constrained by the AONB, to be a 'larger village'. It has the smallest population of any 'larger village' and is smaller than Chardon which at 862 people is a 'smaller village'. Change to plan: Re-organise Table 2 to have AONB and non-AONB affected villages separately in the Settlement Hierarchy. Re-classify Ivinghoe, it is not large in either population or geographical size and does not meet Table 2's description of 'larger villages' as "Larger, more sustainable villages that have at least reasonable access to facilities and services and public transport, making them sustainable locations for development" This will help the Council demonstrate that it is having regard under Section 85 of the Countryside and Rights of Way Act 2000).</p> <p><b>OBJECT S3 Settlement hierarchy and cohesive development</b></p>	
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	<p>The policy contains two criteria giving special reasons to avoid development in the countryside. A third criterion on the setting of the AONB could usefully be added. Very careful consideration needs to be exercised for any expansion below the scarp slope of the Chilterns. Views out of the AONB from key viewpoints e.g. Coombe Hill, Ivinghoe Beacon and the Ridgeway National Trail, are some of the most important views in the Chilterns, central to the public's enjoyment of the AONB. These are nationally important places on a National Trail, which should be protected for current and future generations to enjoy. Change to plan: Add a third criterion: c) harm the Chilterns AONB or its setting, particularly important views from the scarp slope of the Chilterns</p> <p>SUPPORT S2 Spatial Strategy for Growth</p> <p>CCB supports and welcomes the Council's approach of accommodating some unmet needs of the local authorities in southern Buckinghamshire, which are highly constrained by the Chilterns AONB. In this important way, the Council is demonstrating good practice under the Duty to Cooperate, and its Duty of Regard to conserving and enhancing the natural beauty of the AONB under the Countryside and Rights of Way Act 2000 (section 85).</p> <p>OBJECT 2.6</p> <p>CCB would like to see the setting of the Chilterns AONB referred to in the objectives. Development in the setting of the AONB can harm the AONB. The setting of the AONB is the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could have an impact on the natural beauty and special qualities of the AONB. Please see the CCB's Position Statement on Development Affecting the Setting of the Chilterns AONB which contains advice on harm and principles for avoiding harm.</p> <p>Change to plan: Add "and its setting" to read: "Planning positively for biodiversity and green infrastructure, the overall approach will minimise development on high-quality agricultural land, conserve and enhance areas of sensitive landscape including the Chilterns AONB and its setting and designated local landscapes and achieve high-quality design and building at appropriate densities."</p> <p>OBJECT 2.4</p> <p>The coverage of AONB in the vision and strategic objectives does not give 'great weight' to the AONB (as it should under NPPF para 115). It is mentioned once (in relation to Aylesbury being a tourism base for exploring the area) and not at all in the rural areas section of the vision. The Chilterns AONB is an iconic nationally protected landscape, which attracts 55 million visits a year and Aylesbury Vale residents benefit from the health and well-being benefits of having the Chilterns AONB on their doorstep.</p> <p>Change to plan: The CCB would like to see more emphasis on the AONB in the spatial vision and strategic objectives. Add: We will have protected the Chilterns AONB and valued nature both for its own sake and the things it gives us - like clean water*, food and space to breathe. *much of Aylesbury Vale's water comes from the crystal clear chalk headwaters that spring out the slopes on the Chilterns escarpment</p>	
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		<p><b>SUPPORT 1.33</b> CCB supports and welcomes the Council's approach of recognising that the local authorities in southern Buckinghamshire are significantly constrained by the Chilterns AONB. In this important way, the Council is demonstrating good practice under the Duty to Cooperate, and its Duty of Regard to conserving and enhancing the natural beauty of the AONB under the Countryside and Rights of Way Act 2000 (section 85).</p> <p><b>SUPPORT 1.59</b> This is a good introduction to the Chilterns AONB and its national importance</p> <p><b>OBJECT District key diagram</b> Please correct the typo in the key, Chiltern AONB should read Chilterns AONB</p> <p><b>SUPPORT 1.13</b> The CCB supports the capacity-based approach. This is better than imposing a mathematically-derived percentage growth on settlements, blind to their constraints. It allows for a distinction to be made between AONB and AONB-villages. It demonstrates regard to conserving and enhancing the natural beauty of the AONB; a legal requirement under Section 85 of the Countryside and Rights of Way Act 2000.</p> <p><b>SUPPORT 1.12</b> The CCB supports and welcomes the Council's approach of accommodating some unmet needs of the local authorities in southern Buckinghamshire, which are highly constrained by the Chilterns AONB. In this important way, the Council is demonstrating good practice under the Duty to Cooperate, and its Duty of Regard to conserving and enhancing the natural beauty of the AONB under the Countryside and Rights of Way Act 2000 (section 85).</p>	
<p>North Herts Local Plan Examination Statement</p>	<p>NHDC</p>	<p>Summary (for full statement please see <a href="https://www.north-herts.gov.uk/planning/planning-policy/local-plan/local-plan-examination/hearing-timetable-and-statements-week-6">https://www.north-herts.gov.uk/planning/planning-policy/local-plan/local-plan-examination/hearing-timetable-and-statements-week-6</a>)</p> <ol style="list-style-type: none"> <li>1. The CCB considers that the allocation of sites EL1, EL2 &amp; EL3 East of Luton for a new neighbourhood of 2,100 homes is neither justified nor appropriate because of:             <ol style="list-style-type: none"> <li>i) the likely impacts of the development on the setting of the Chilterns AONB</li> <li>ii) the implications for the boundary review of the Chilterns Area of Outstanding Natural Beauty since this land is within an area of land proposed to be included in the AONB in Chilterns AONB boundary variations</li> <li>ii) the SEA has not adequately assessed the cumulative impacts of this development together with growth of Luton to north and west, Luton airport expansion, new road proposals and employment parks.</li> </ol> </li> <li>2. The CCB seeks amendments to remove the allocations of sites EL1, EL2 &amp; EL3 East of Luton to allow for the AONB boundary</li> </ol>	<p>11.1.18 and participated in examination hearing 7.2.18</p>

		review process to be undertaken and for further assessment of cumulative impacts of development.	
Aston Clinton Neighbourhood Plan Publication Stage	AVDC	<p>Page 15 Future Vision for the Environment SUPPORT, but suggest referring to views both to the countryside and also from the nationally protected AONB:</p> <ul style="list-style-type: none"> <li>◆ To protect green spaces and important views to the countryside, especially those across to the Chilterns and Halton Airfield from Aston Clinton Park, to help maintain the rural character of the parish.</li> </ul> <p>to</p> <ul style="list-style-type: none"> <li>◆ To protect green spaces and important views to and from the countryside, especially those to and from the Chilterns and to Halton Airfield from Aston Clinton Park, to help maintain the rural character of the parish.</li> </ul> <p>This vision regarding protecting views to Halton Airfield has not been followed through with a policy in the ACNP– suggest adding one. The Plan should protect Halton Airfield from development. The CCB would oppose development of the Airfield given the open panoramic views from public viewpoints in the AONB.</p> <p>Also suggest correction typo Chilterns AONB not Chiltern AONB.</p> <p>The CCB has advice on AONB setting: see <a href="#">Position statement: Development Affecting the Setting of the Chilterns AONB.</a></p> <p>SUPPORT Policy EN3 CCB supports this policy and the designation of all the Local Green Spaces.</p> <p>With the planned growth of Aylesbury this parish should be a focus of GI expansion and environmental enhancement, linking people to the AONB and the National Trail.</p> <p>In particular CCB agrees with the Local Green Space Report’s conclusions for Green Park “The entire site represents a quintessential English landscape of park and woodland and is simply beautiful to view and visit. The whole estate forms a vital role in the rural setting of the adjoining AONB and the nearby Site of Special Scientific Interest (SSSI). It is of particularly special value to the community as can be evidenced in the consultation document”</p> <p>The protection of the site for recreational and educational facilities is welcomed and very much in line with our thinking on what’s needed now in the future. Offering young people both indoor and outdoor activities in the AONB and its setting is directly supported by the Government’s new 25 year environment plan: <a href="https://www.gov.uk/government/publications/25-year-environment-plan">https://www.gov.uk/government/publications/25-year-environment-plan</a></p>	17.1.18
Watlington Neighbourhood Plan Publication Stage	SODC	<p>The CCB strongly supports this part of the vision:</p> <p>“The natural and historic environment will be conserved and from the vantage point of Watlington Hill, the town will retain its compact appearance in the landscape”.</p> <p>We also support</p> <ul style="list-style-type: none"> <li>• Policy P1(c) and (d) about landscape views of the town.</li> <li>• Policy P3 which is a good policy covering AONB views, watercourses net gain and biodiversity and protection of dark</li> </ul>	25.1.18

		<p>skies.</p> <ul style="list-style-type: none"> <li>• Policy P7(c) on supporting the local food economy</li> <li>• Policy P9 – we would be happy to assist with identifying priorities for CIL spending in the Chilterns AONB to further its conservation and enhancement, and people’s understanding and enjoyment of the AONB.</li> </ul> <ul style="list-style-type: none"> <li>• We recognise that there are particular challenges at Watlington because most of the possible development sites either adjoin or are very visible from the nationally protected landscape of the Chilterns AONB. The chalk escarpment overlooks the town. Watlington Hill gives among the most magnificent panoramic views in Oxfordshire. On a clear day it is possible to see most of South Oxfordshire from here; the towers of Didcot power station to the west, to the M40 and beyond to the east, and straight ahead across the Oxfordshire Vale all the way to Oxford. Watlington Hill is open access land in the nationally protected AONB landscape, managed by the National Trust, so constitutes a very high value visual receptor. Accommodating housing and achieving a bypass to reduce traffic congestion and resolve air quality issues in the town centre are also important goals. They can only be achieved if it is possible to reconcile with statutory duties towards the natural and historic environment.</li> </ul> <p><b>Recommended changes</b></p> <ul style="list-style-type: none"> <li>• The CCB recommends the following changes to the plan to ensure the views from the AONB are conserved and enhanced. Without these changes, the development is unlikely to come forward in a way that meets the plan’s vision of conserving the natural and historic environment and retaining the compact appearance of the town in the landscape.</li> </ul> <p><b>Watlington Housing Policy: Site A</b></p> <p>This site is in the setting of the Chilterns AONB. There are open views of the site from Watlington Hill. The CCB respectfully request that the Examiner views the proposed development sites from Watlington Hill. The policy should revert to the 65 dwellings recommended for WAT 11 and WAT12 recommended in the Kirkham landscape capacity study commissioned by the district council. This is the only landscape assessment available for Watlington which compares the sites and gives independent advice on their landscape capacity to accommodate development.</p> <p>The following policy wording changes would address our concerns:</p> <p><del>440</del> <b>65</b> dwellings, of which 40% (indicative 56) should be affordable homes</p> <p>The Planning Proposals prepared for this site should demonstrate how the proposed development: <i>(Add new bullet point at the top of</i></p>	
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		<p><i>the list)</i></p> <ul style="list-style-type: none"> <li>• <b>Is landscape-led and appropriate for the setting of the AONB, with care being taken over the site layout, design, orientation, height, bulk and scale of structures and buildings; careful consideration of colours, materials and the reflectiveness of surfaces; restraint and care over the installation and use of street lighting, floodlighting and other external lighting to prevent harm to the dark night skies of the AONB and its setting. This should be set out in a Design and Access statement and tested through a full Landscape and Visual Impact Assessment (compliant with the methodology set out in the Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> edition) including photomontages showing the proposed development in the landscape as viewed from Watlington Hill.</b></li> </ul> <p>Is designed so that the built edge of the development blends into the landscape <b>and mitigates the impact of the development on views from the AONB.</b></p> <p><b>Watlington Housing Policy: Site B</b></p> <p>This site is in the setting of the Chilterns AONB. The following policy wording changes would address our concerns:</p> <p>The Planning Proposals prepared for this site should demonstrate how the proposed development: <i>(Add new bullet point at the top of the list)</i></p> <ul style="list-style-type: none"> <li>• <b>Is landscape-led and appropriate for the setting of the AONB, with care being taken over the site layout, design, orientation, height, bulk and scale of structures and buildings; careful consideration of colours, materials and the reflectiveness of surfaces; restraint and care over the installation and use of street lighting, floodlighting and other external lighting to prevent harm to the dark night skies of the AONB and its setting. This should be set out in a Design and Access statement and tested through a full Landscape and Visual Impact Assessment (compliant with the methodology set out in the Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> edition) including photomontages showing the proposed development in the landscape as viewed from Watlington Hill.</b></li> <li>• <b>Is designed so that the built edge of the development blends into the landscape to the north and west <b>and mitigates the impact of the development on views from the AONB.</b></b></li> </ul> <p><b>Watlington Housing Policy: Site C</b></p> <p>This site is in the setting of the Chilterns AONB. The Kirkham report recommended a maximum of 60 dwellings, and less is likely to be possible given that a bypass would be incorporated too. The following policy wording changes would address our concerns:</p>	
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		<ul style="list-style-type: none"> <li>• <b>A maximum of 60 dwellings, of which 40% (indicative 24) should be affordable homes</b></li> </ul> <p>The Planning Proposals prepared for this site should demonstrate how the proposed development:</p> <p><b>Is landscape-led and appropriate for the setting of the AONB, with care being taken over the site layout, design, orientation, height, bulk and scale of structures and buildings; careful consideration of colours, materials and the reflectiveness of surfaces; restraint and care over the installation and use of street lighting, floodlighting and other external lighting to prevent harm to the dark night skies of the AONB and its setting. This should be set out in a Design and Access statement and tested through a full Landscape and Visual Impact Assessment (compliant with the methodology set out in the Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> edition) including photomontages showing the proposed development in the landscape as viewed from Watlington Hill and the White Mark.</b></p> <p><b>Watlington Housing Policy: Additional Sites</b></p> <p>Watlington and District Nursing Home (Site E) is within the AONB and visible from the elevated viewpoints of the White Mark and Watlington Hill. Depending on the scale and the impacts, this could constitute major development in the AONB, which should be refused under NPPF para 16 except in exceptional circumstances and where it can be demonstrated that it is in the public interest. Great weight should be given to conserving the landscape and scenic beauty of the AONB (NPPF para 115). The policy currently fails to recognise that it is in the AONB location or refer to design considerations in the AONB.</p> <p><i>Add asterisk to sites E* and rural exceptions sites* and add new text below bullet point list:</i></p> <p><b>*provided that schemes in the AONB or its setting are landscape-led, designed to conserve and enhance AONB views and do not constitute major development in the AONB.</b></p> <p><b>Policy P5 New Housing Development</b></p> <p>The CCB is concerned that Policy P5(b) allows windfalls of up to 5 new houses without restriction on their location or existing brownfield/ greenfield status. This could encourage greenfield developments of 5 houses in unspoilt and ecologically sensitive parts of the parish in the Chilterns AONB e.g. Christmas Common, Greenfield and Howe Hill. These are very small places or hamlets, none of these are even smaller villages in the SOLP settlement hierarchy, 5 house developments would not be acceptable or sustainable. As it stands the policy applies throughout the neighbourhood area. This is more permissive than the NPPF or the</p>	
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		<p>adopted or emerging South Oxfordshire Local Plan policies. There is also nothing to stop incremental harm to the AONB from one greenfield 5 house scheme after the other being developed over the plan period.</p> <ul style="list-style-type: none"> <li>• A similar approach should be taken to P7 Employment which has the caveats “appropriate to the location within the WNDP area”. Policy P5 should cover infill development and be restricted to the built-up area of Watlington (which could helpfully be defined using a settlement boundary).</li> <li>• The whole paragraph of supporting text starting “<del>In line with NPPF para 55...</del>” should be deleted, these proposals are not in line with the NPPF which instructs LPAs to avoid isolated new homes in the countryside.</li> </ul> <p>b) <b>Infill</b> development of new houses <b>within the built-up area of Watlington</b> which are not allocated in the WNDP will be granted planning permission if they are on small sites for up to 5 new houses and comply with other policies in this NDP and the emerging SODC Local Plan 2033.</p> <p>Delete whole paragraph of supporting text starting “<del>In line with NPPF para 55...</del>”</p> <p><b>Maps</b></p> <p>These should show the full extent of the parish and neighbourhood area, not just the town. Needs amending on:</p> <ul style="list-style-type: none"> <li>• Map 3 Areas with special designations – built environment</li> <li>• Map 4 Areas with special designations – natural environment</li> </ul> <p>Add various CCB documents to the Appendix B sources of evidence list.</p> <p><b>Comments on SEA and HRA</b></p> <ol style="list-style-type: none"> <li>1. Understanding the effects on the Chilterns AONB is important for shaping the plan. The effects on the Chilterns AONB are not just visual, it is not simply a landscape issue. It is a common misunderstanding that development which is sited and designed to reduce visual harm in the AONB is all that is needed. Conserving natural beauty involves conserving the flora, fauna and geological and physiographical features of the AONB (defined in the Countryside and Rights of Way Act section 92). Impacts can be direct (e.g. loss of habitat by building on it) or indirect (e.g. development generating more traffic and harm to air quality and tranquillity in the AONB).</li> <li>2. The CCB accepts that Watlington NDP is relying on the conclusion from SODC that no Appropriate Assessment is required. We will continue to raise through the local plan examinations the issue of the cumulative impacts of</li> </ol>	
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		<p>development on the Chilterns AONB and in particular on our most important wildlife sites (Special Area of Conservation or SACs). It is onerous for a NDP to tackle these issues, and in particular to assess cumulative impacts from major growth outside the neighbourhood area and potentially in other local authority areas. We note the conclusion in Watlington NDP section 1.4 that it is not possible to screen out likely significant effects of air pollution and recreation pressures on Aston Rowant SAC and Chilterns Beechwoods SAC when the planned development in Watlington is assessed in combination with other plans and projects.</p> <p>3. The cumulative effects of the Watlington NDP plus others e.g. proposed major housing and employment development at Stokenchurch and High Wycombe (Wycombe Local Plan), Chalgrove Airfield (SOLP), Chinnor (Chinnor NDP) and Princes Risborough (Wycombe LP) will all add to traffic using the M40 and other roads in or near the Aston Rowant Special Area of Conservation (A40, Christmas Common Road etc). The HRA screening report does not list or identify the proposals in other plans it has assessed. It is unclear why the HRA has screened out potential effects from air pollution on the Aston Rowant SAC. Using the screening methodology proposed in this HRA, the Aston Rowant SAC should not be screened out because it is within 200m of a trunk road (including motorways) the M40 and Watlington neighbourhood plan allocations are within 17km of the SAC. The Aston Rowant SAC Site Improvement Plan identifies the risks of atmospheric nitrogen deposition upon juniper. It seems surprising that “an air quality model confirms that the in-combination effects of growth would result in increased NO<sub>x</sub> concentrations across part of the SAC, these would not result in any N deposition on the Aston Rowant SAC” (para 4.17).</p> <p>4. The cumulative impacts of growth of Watlington plus the proposed new development at Chalgrove Airfield should also be assessed in landscape terms; these developments could also have a cumulative impact on views. For example from Watlington Hill, in the foreground the growth of Watlington in width and depth, and a new bypass, and behind that the strategic development of 3000 homes plus employment development at Chalgrove airfield.</p> <p>5. Policy P2 to safeguard land for a new bypass has not been assessed in the HRA Screening Assessment as a major transport scheme. In the Screening Matrix for Policy P2 Transport “Likely activities (operation) to result as a consequence of the proposal” the response put is “None - this policy provides for safeguarding of land for a re-aligned B4009 and measures to reduce transport impacts, but will not itself result in new development.” This seems questionable, in removing the bottleneck of traffic in the town the bypass may attract and increase traffic, influencing route choice. In time development may be attracted to the land next to the bypass.</p>	
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Network Rail East West rail western section	NR	<p>Thank you for consulting the CCB on the East West Rail Western Section Phase 2 Round 3.</p> <p>I have reviewed the proposals and note that proposals for works on the Aylesbury Branch (Princes Risborough to Aylesbury) have now been dropped. Consequently I do not think the scheme will harm the Chilterns Area of Outstanding Natural Beauty and I can confirm that the CCB has no objection.</p>	6.2.18
Herts Draft Minerals Local Plan	HCC	<p><b>Para 3.15</b></p> <p>Add to the list: Chilterns AONB Management Plan. Although not part of the development plan, this is a statutory plan for the AONB prepared under the Countryside and Rights of Way Act 2000 and it affects Hertfordshire. See the advice in NPPG Paragraph: 004 Reference ID: 8-004-20140306 (<a href="https://www.gov.uk/guidance/natural-environment">https://www.gov.uk/guidance/natural-environment</a>)</p> <p><b>Para 4.4</b></p> <p>The ONS housing projections are presented simplistically here as a proxy for future housing growth. They do not take account of constraints like AONB or Green Belt which may mean that the numbers or distribution between areas change.</p> <p><b>Policy 1 Sustainable Development</b></p> <p>At the last sentence of the policy it would be helpful to add the footnote in the NPPF (footnote 9 to NPPF para 14) to explain which are the specific policies in the NPPF that indicate development should be restricted:</p> <p>Or could do an edited list including only those present in Hertfordshire, and add ancient woodland and veteran trees as per the DCLG consultation in 2017.</p> <p><b>Policy 6 Brick Clay</b></p> <p>The CCB supports this policy, but Bovingdon Brickworks has closed so the plan wording needs updating. This brickworks and its clay reserves should be safeguarded, and any change of use should be resisted so that the brickworks could re-open in the future (eg current coach company - ensure no lawful use becomes established here). The closure means there is now only one remaining brickworks in the Chilterns, which is worrying for repairing historic Chilterns buildings and for new buildings in the local vernacular. Safeguarding the brickworks would be in line with Policy D4 of the Chilterns AONB Management Plan: "Policy D4. The retention of the local brick-making industry should be supported by seeking the use of locally-made bricks in new developments, consistent with the principles of environmental sustainability and the Chilterns Buildings Design Guide and related Supplementary Technical Notes."</p> <p><b>Para 9.9</b></p> <p>Add reference to the Chilterns AONB in this section about chalk and the Chiltern Hills. Explain the importance of having local flint</p>	8.2.18

	<p>available for building projects in the Chilterns. This is in line with Chilterns AONB Management Plan policies:</p> <p>Policy D1. The natural beauty of the Chilterns AONB should be conserved and enhanced by encouraging the highest design standards, reinforcing local distinctiveness and respecting the landscape, settlement character and special qualities of the AONB.</p> <p>Policy D2. High standards of development which respect vernacular architectural styles and demonstrate appropriate best practice in the use of traditional materials (flint, brick, roofing materials and timber) should be promoted.</p> <p>Policy D3. The sustainable use of local natural resources (timber, clay and flint) for local building purposes should be supported by seeking their use in new developments."</p> <p>and the CCB also has technical guidance entitled Chilterns Flint on how to use flint in buildings and walls available here <a href="http://www.chilternsaonb.org/conservation-board/planning-development/buildings-design-guidance.html">http://www.chilternsaonb.org/conservation-board/planning-development/buildings-design-guidance.html</a></p> <p><b>Para 9.9</b></p> <p>The CCB supports the mention of flints for use in heritage restoration of older buildings. This should be extended to refer to use in new buildings too. This would be in line with the Chilterns AONB Management Plan policies D2 and D3. The Conservation Board actively promotes environmentally sensitive construction methods (primarily the use of locally-produced building materials and lime mortar) through the production and use of its Supplementary Technical Notes on Chilterns building materials, including one on how to use flint (see <a href="http://www.chilternsaonb.org/conservation-board/planning-development/buildings-design-guidance.html">http://www.chilternsaonb.org/conservation-board/planning-development/buildings-design-guidance.html</a>)</p> <p><b>Para 12.7</b></p> <p>Suggest adding to the list of cumulative impacts:</p> <ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Air pollution</li> <li>• Light pollution</li> </ul> <p>The CCB has recently published guidance on Cumulative Impacts of Development on the Chilterns AONB which may be of assistance, see <a href="http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html">http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html</a></p> <p><b>Paragraph 13.30</b></p> <p>There is very little coverage of national designated landscape - AONBs - in the plan. Add a summary of national policy relating to AONB:</p> <p>"In Areas of Outstanding Natural Beauty, great weight should be given to conserving landscape and scenic beauty, and major</p>	
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	<p>development should be refused except in exceptional circumstances and where it is in the public interest*</p> <p>*(add footnote) NPPF, 2012 - paragraphs 115 and 116"</p> <p><b>Policy 17 Landscape and Green Infrastructure</b></p> <p>There is not enough focus on AONBs in the plan. Hertfordshire County Council has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the Chilterns Area of Outstanding Natural Beauty (Countryside and Rights of Way Act 2004 Section 85).</p> <p>Suggest Policy 17 is restructured and reworded. It must be stressed that the Chilterns AONB is a nationally protected area. It has national importance, is of outstanding natural beauty and local authorities have a duty to ensure that development conserves and enhances the natural beauty.</p> <p>Better still a new policy could be added specifically on the AONB. See this example policy text from the adopted Oxfordshire Minerals and Waste Core Strategy:</p> <p><i>Policy C8 Great weight will be given to conserving the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB) and high priority will be given to the enhancement of their natural beauty. Proposals for minerals and waste development within an AONB or that would significantly affect an AONB shall demonstrate that they take this into account and that they have regard to the relevant AONB Management Plan. Major developments within AONBs will not be permitted except in exceptional circumstances and where it can be demonstrated they are in the public interest, in accordance with the 'major developments test' in the NPPF (paragraph 116). Development within AONBs shall normally only be small-scale, to meet local needs and should be sensitively located and designed.</i></p> <p>and this supporting text:</p> <p><i>When considering proposals for minerals and waste development in Areas of Outstanding Natural Beauty (AONB) the County Council has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of those areas. The setting of and views associated with the Chilterns, Cotswolds and North Wessex Downs AONBs should also be taken into account in considering development proposals<sup>103</sup>. National policy requires great weight to be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection<sup>104</sup>. Major development should not take place in AONBs unless there are exceptional circumstances and such development is 'in the public interest'<sup>105</sup>.</i></p> <p><i>A key aim of planning in AONBs is to take account of the need to safeguard agriculture, forestry, other rural industries and the economic and social needs of local communities<sup>106</sup>. This points to development being small scale to serve local needs. In Oxfordshire this is likely to rule out most mineral development with the possible exception of small quarries supplying local building stone, for</i></p>	
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	<p><i>example, a quarry in the Cotswolds AONB supplying building or walling stone to meet needs within the AONB and surrounding areas where this is the local traditional building material.</i></p> <p><i>Parts of the Cotswolds and North Wessex Downs AONBs are situated close to the large towns of Witney, Wantage and Didcot, which are locations where growth is expected and additional waste will be produced, and are included in the towns specified in Policy W4. The small towns of Chipping Norton, Henley, and Wallingford, which are also specified in policy W4 as locations for waste facilities, are situated close to the Cotswolds, Chilterns and North Wessex Downs AONBs respectively. Small scale<sup>107</sup> waste management facilities for local needs could be acceptable in AONBs where the development would not compromise the objectives of their designation<sup>108</sup>. Policy W4 looks to steer larger scale waste facilities<sup>109</sup> to be in or close to specified towns, but at Witney, Wantage, Didcot, Chipping Norton, Henley, and Wallingford, such facilities will need to be located in a way that does not adversely affect the character or setting of the AONB. Larger scale facilities are unlikely to be acceptable in or close to the AONB. Proposals for development (both minerals and waste) within AONBs should have regard to the relevant AONB Management Plan.</i></p> <p><i>Footnotes</i></p> <p><i>103 The relevant AONB Management Plan should inform the consideration of proposals for development within or in proximity to an AONB.</i></p> <p><i>104 National Planning Policy Framework (2012) paragraph 115.</i></p> <p><i>105 National Planning Policy Framework (2012) paragraph 116.</i></p> <p><i>106 Natural England website guidance.</i></p> <p><b>Policy 18 Biodiversity</b></p> <p>Strengthen biodiversity net gains by: removing "aims for" net gains and deleting "where appropriate".</p> <p><b>Policy 20 Strategic Transport</b></p> <p>Policy should refer to air pollution. Potential for reductions in plant diversity from oxides of nitrogen. The primary route network runs close to sensitive internationally protected habitats e.g. A41 runs close the Chilterns Beechwoods Special Area of Conservation</p> <p><b>Glossary entry on AONBs</b></p> <p>Update the entry on AONBs, the Countryside Commission no longer exists. Suggest replace with:</p> <p>Area of Outstanding Natural Beauty (AONB) – area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty. Hertfordshire contains part of the Chilterns AONB which was designated in 1965.</p>	
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<p>Central Beds Local Plan Reg 19 Publication</p>	<p>CBC</p>	<p><b>OBJECT</b> <a href="#">Policy SA1: North of Luton</a></p> <p>CCB objects to the scale of proposed strategic urban extension of Luton northwards because of harm to Chilterns AONB. It appears the M1-A6 Strategic Link Road has been positioned to maximise the amount of developable land. The allocation should be redesigned to exclude all land in the Chilterns AONB (including the road). It should also remove development from the east of the site which is in the setting of the AONB and would harm important views from Galley and Warden Hills. The development would appear as a major encroachment of built development northwards. The view to Galley Hill from AONB on the site and from John Bunyan Way footpath would be harmed. Buildings would also block the view of the chalk escarpment from the public rights of way within the site.</p> <p>The site itself is high quality countryside, with few detractors, in active productive agricultural use, some arable, some livestock. See photo below. This is not degraded urban fringe landscape. It is tranquil and has areas of mature broadleaf woodland, and attractive mature tree belts/ hedgerows. The site falls between the Galley and Warden Hills SSSI and Sundon Chalk Quarry SSSI and development should enhance and not sever green links between them.</p> <p>A full landscape and visual impact assessment should be undertaken and the development should be landscape-led to ensure harm is avoided. The landscape analysis in the Site Assessment proformas is not enough, it just states what development should achieve, without identifying issues and harm.</p> <p>The eastern part of the site is particularly visible from Galley Hill and Warden Hill, major sensitive viewpoints in the AONB. The special qualities of the Chilterns AONB include such views. These views should be protected by planning no development in the land between the A6 and the hedgerow/ tree belt along the western footpath snaking northwards from Betty Robinson House. This would allow the topography (which slopes away west of the tree belt) and trees to screen the development. The existing development of Bramington Park housing estate sits down on lower land, new more elevated development would be more visible.</p> <p>The road would constitute major development in the AONB, to which NPPF para 115 applies. It should be realigned southwards to exclude land in the AONB. It is not clear why it has been drawn so far north. The junction of the new road with the A6 is likely to involve a roundabout and trigger the use of tall lighting columns which is highly likely to be harmful to the AONB. The new road should be carefully aligned to avoid creating a new traffic corridor which the eye would follow from the important AONB viewpoint of Galley Hill.</p> <p>As explained in our Position Statement on Development Affecting the Setting of the Chilterns AONB, rooflines, roofscape, density, design and layout will all be crucial to avoiding harm to the AONB. The mixed education and residential parcel on the A6 should be relocated and tucked within the site, it will stick out into the AONB.</p>	<p>21.2.18</p>
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	<p>Development should not sever the green corridor from County Wildlife Site running down into the Bramingham Park estate or between the SSSIs beyond the site. In terms of density, gardens and open space must be large enough to allow for the growth of mature trees. The existing high voltage cables should be undergrounded rather than accommodated within the design. The Board would object to the provision of formal playing fields (and possibly buildings) and children’s play spaces within the AONB – all of these facilities should be located within the main part of the development area. The Board considers that such facilities would neither conserve nor enhance the natural beauty of the Chilterns AONB. Any use of the land should be very informal with the provision of additional rights of way being the primary aim. The Parish GI plan contains aspirations to link Sundon Wood to Sundon Park, and create extensive green corridors linking Bramingham Park to George Wood, and Great Bramingham Wood to the pockets of woodland to the north. Current proposals do not deliver these GI aspirations. CCB would support such green corridors, in line with Lawton principles of making space for nature through more, bigger, better joined up protected areas and a wider countryside which is more permeable for wildlife. The GI proposals should be moved from aspirations to requirements.</p> <p>Cumulative impact on the AONB of this growth location, together with others proposed in this and neighbouring authorities, should be assessed. The CCB has recently published a Position statement on Cumulative Impacts of Development on the Chilterns AONB (attached). Proposals should be scaled back and appropriate mitigation secured. As well as landscape and visual impacts, other important types of impacts on the AONB need to be assessed. These include increased traffic through AONB (harming air quality, ecology, dark skies and tranquillity) and recreational impacts (increased visitor use of AONB). These impacts should be mitigated by identifying land management and visitor facilities projects in AONB and requiring the development to fund them.</p> <p><b>OBJECT <a href="#">Policy HA1: Small and Medium Allocations</a></b></p> <p>Inset Green Belt villages in the South Area that are in the setting of the AONB would not be suitable for extension if this harms the AONB. In particular settlements below the chalk escarpment where there are panoramic views from the AONB eg Harlington and Barton-Le-Clay may not be suitable. Conserving and enhancing the AONB must be given great weight (NPPF para 115). For more information please see CCB’s Position Statement on Development Affecting the Setting of the AONB.</p> <p><b>OBJECT <a href="#">5.4 Spatial Strategy Approach</a></b></p> <p>Question why second highest level of growth allocated to most constrained part of Plan area in terms of national landscape designation</p> <p>The justification for high quantum of growth to the South Area makes no reference to negative effects on nationally protected landscape of the AONB, unbalanced analysis</p> <p><b>OBJECT <a href="#">4.1 The Vision - Where we want to be in 2035</a></b></p>	
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		<p>Add AONB</p> <p><b>SUPPORT</b> <a href="#">Policy EE7: The Chilterns Area of Outstanding Natural Beauty</a></p> <p>CCB warmly welcomes this policy which is a close reflection of the model policy developed by the Chilterns AONB Planning Forum to provide cross-boundary consistency to the local plans covering the AONB. One small typo could usefully be corrected in the first bullet point please: Chilterns not Chiltern)</p>	
Draft London Plan	Mayor of London	<p>Policy G6 Biodiversity and access to nature.</p> <p>Chapter 8 of the Plan should look beyond London's boundaries to recognise the value and accessibility of the nationally protected landscapes that are on London's doorstep. The plan currently fails to mention the protected landscapes that ring London: the Chilterns Area of Outstanding Natural Beauty (AONB), Surrey Hills AONB, Kent Downs AONB, High Weald AONB, Dedham Vale AONB and the South Downs National Park. These should be recognised as breathing spaces of strategic importance for London. They are nationally protected assets and some of the finest landscapes in the UK. As well as providing clean air, clean water and local food and drink products, they provide opportunities for peace and adventure, like walking, cycling, horse-riding and watching wildlife. Many of these experiences are completely free, accessible to all, and of great value for health and wellbeing. In particular the Chilterns AONB is the only National Park or AONB that is on the tube line (stops at Amersham, Chesham) and is within an hour's journey for 10 million people. For more information please see <a href="http://www.landscapesforlife.org.uk/about-aonbs/visit-aonbs/">http://www.landscapesforlife.org.uk/about-aonbs/visit-aonbs/</a> and <a href="http://www.chilternsaonb.org/">http://www.chilternsaonb.org/</a></p>	27.02.18

**APPENDIX 3****Current Development Plan Consultations:**

Consultation document	Consulted by	Stage	Deadline for CCB responses
Watlington Neighbourhood Plan hearing	SODC	Watlington NP hearing	5.3.18
Heathrow expansion and airspace principles	Heathrow airport	Heathrow Expansion and Airspace Principles Consultation January 2018	28.3.18
Herts Waste Local Plan	HCC	Waste Local Plan initial consultation	30.3.18
Bucks Draft Freight Strategy	BCC	Bucks Draft Freight Strategy	9.4.18
Ox-Cam Strategic Expressway	Highways England	Preferred Corridor question	12.4.18

**Item 8**                      **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 4.
2. Since the last Planning Committee papers for the November 2017 meeting, the Board has made 16 formal representations on planning applications and 4 appeal representations, of which 9 were objections (includes 3 appeals) and 7 were comments. The formal representations are summarised in Appendix 5.
3. Current live casework is listed in Appendix 6.

**Recommendations**

1. **That the Committee notes and approves the responses made in connection with the applications listed in Appendix 5.**

## APPENDIX 4

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

Location	LPA	Development	Ref. No.	Status	CCB response	Date CCB responded
Land West of Cockernhoe / Land East of Cophorne, Cockernhoe.	NHDC	Erection of 660 dwellings	16/02014/1	Pending	<b>CCB Comments</b> <ul style="list-style-type: none"> <li>• Landscape character issues.</li> <li>• AONB candidate status</li> <li>• Support for plan-led approach.</li> </ul>	05.03.16
Land south and north-west of Cockernhoe and east of Wigmore (Stubbocks Walk), Brick Kiln Lane, Cockernhoe	NHDC	Mixed use application for demolition of existing buildings and construction of up to 1,400 new dwellings (C3 use) together with retail, educational and community facilities (A1-A5, D1 and D2 uses) and associated roads, open space, green infrastructure and ancillary infrastructure - outline planning application with all matters reserved	17/00830/1	Pending	<b>CCB Objection</b> <ul style="list-style-type: none"> <li>• Landscape impact upon landscape character areas LCA 202 and 212, as this land has potential for incorporation into the Chilterns AONB</li> <li>• CCB proposed a boundary change in 2013 to include land in this area of North Herts.</li> <li>• The area to the east of Luton is a potential candidate for an extension of the AONB based on criteria published by Natural England in March 2011.</li> <li>• The area has a clear affinity with the rest of the Chilterns. Woodland.</li> </ul>	3.8.17
Land to rear of Cleeve Cottages Icknield Road Goring	SODC	P16/S3001/O	Erection of 10 new dwellings	Granted 24 <sup>th</sup> Jan 2018	<b>CCB Comments</b> <p>CCB has asked that attention is paid to AONB Management Plan D1 that '<i>The natural beauty of the Chilterns AONB should be conserved and enhanced by encouraging the highest design standards, reinforcing local distinctiveness and respecting the landscape, settlement character and special qualities of the AONB</i>'.</p>	25.1.17

The Orchard, Bedford Road, Houghton Regis,	CBC	CB/17/00501/OUT	Outline: Demolition of existing buildings/str uctures and redevelopme nt of site to provide 21 dwellings, an estate road, landscaping and associated works	Pending	<b>CCB Comments</b>  This application appears to raise similar issues to the application at Bury Spinney Thorn Road Houghton Regis for outline approval up to 100 dwellings (CB/16/02086/OUT).  For that application CCB commented that the site falls within the Houghton Regis Northern Framework Plan (October 2012) and that this is used for development management purposes together with the adopted joint Core Strategy. CCB promoted a consideration of cumulative impacts here, accepting its distance away from the statutory boundary of the protected landscape.	14.7.17
New Barn Farm, Cholsey	OCC	MW 0094.16	Extraction of sand and gravel with associated processing plant, conveyors, office and weighbridg e, parking areas.	Pending	<b>CCB Objection</b>  The adopted Waste and Minerals Local Plan Policy PE2 establishes that planning permissions will not be given for development within land outside those identified in that plan, unless the apportioned supply cannot be met from areas identified.	9.2.17
Land to the south of Newnham Manor, Crowmarsh Gifford Planning Application	SODC	P16/S3852/FUL	Hybrid planning application for the erection of 100 new residential dwellings	Resolution to grant subject to S106 16.1.2018	<b>CCB Qualified Objection – withdrawn post amendments to scheme</b>	8.2.17 and 22.6.17
Village Green, Potten End, Berkhamsted.	PINS Common Land Decisions	HLB_Div8Sec16DefraApp	Commons Act 2006 – Section 16. Application deregister an area of Village Green	Withdrawn 1.2.2018	<b>CCB Comments</b>  We do not feel that the extension of the land for parking would conflict with those policies in this case. We would recommend, subject to the powers permitted by the Commons Act 2016, that attention to maintaining a soft edge to the Common Land is maintained, by virtue of the design of the surfacing and the careful use of open	27.7.17

					fencing to enclose the parking spaces. These are matters of design detail and not matters of principle.	
The Wycliffe Centre Horsleys Green.	WDC	17/07241/FUL	Demolition of all existing buildings and structures and redevelopment of a supported living community (Class C2) providing 169 units	Granted 18.1.18	<p><b>CCB Comments</b></p> <p>(1) Planning Statement. The supporting planning statement makes reference to a landscape and visual impact assessment (at its 10.39) but we could not find any LVIA on the WDC planning portal. Ordinarily we would comment on such a document as this will assist in assessing the impact on the nearby public right of way and in overlaying the relationship between existing and replacement buildings.</p> <p>(2) Landscape principles. The principles in the landscape master-plan are to be supported and they reinforce key issues, such as the reinforcement of the boundary and the retention of apple orchards. The Management Plan also promotes the reintroduction of cherry orchards, if that can be added. We also support the use of soft materials (such as Breedon gravel) and low impact column mounted lighting</p> <p>(3) Design principles. The design approach demonstrates a commitment to the Chilterns Buildings Design Guide</p>	20.7.17
Vehicle Storage Area, Chaul End Road, Caddington Luton CBC reference	CBC	CB/17/03719/RM	Reserved matters comprising: layout, scale, appearance and landscaping in respect of phase 3 (northern parcel) for 201 dwellings and	Granted 15.12.18	<p><b>CCB Comments</b></p> <p>On materials we would promote a soft visual treatment for the roofing. The 'forticrete' roof tiles are the applicant's submitted preference. CCB suggest careful consideration is given to a machine made plain clay tile and we would refer to chapter 2 of the supplementary technical note on roofing. Whilst accepting the site is not within the</p>	11.8.17

			associated development approved under outline planning permission CB/14/02515/OUT.		AONB, but is close and also adjoins an area of attractive landscape, the predominance of plain tiling in this part of the wider Chilterns provides a rationale here for some reference to and application of the supplementary note.	
Burnside Hatches Lane Great Kingshill Bucks	WDC	17/07337/FUL	Demolition of existing bungalow and erection of 1 x 4 bed and 1 x 3 bed detached dwellings with associated landscaping and access	Granted 10.11.18	<b>CCB Comments</b>  The application site sits within an existing site and is a part of the developed part of Great Kingshill. From a Chilterns AONB standpoint the site sits at a boundary between open land and previously developed land, albeit all within the defined AONB area. Looking to the future potential for greater infilling and the development of single house plots in this vicinity the CCB would recommend that materials follow the guidance in the supplementary technical notes (as above) , especially roofing materials.	30.9.17
Land to the south east of Doveleat Chinnor.	SODC	P17/S2324/O	Outline Planning Application with all matters reserved (apart from access) for the erection of up to 51 dwellings & associated infrastructure	Refused 21.11.17  Reason 2 is a AONB reason	<b>CCB Objection</b>  From the open access land at the Chinnor Hill Nature Reserve the site is evident in the view and displays sensitivity. The South Oxfordshire Landscape Capacity Assessment (2015) in which this land is denoted as site Chi 17, clearly identifies a medium to high sensitivity with respect of views from the escarpment. That assessment did not recommend that this site be taken forward, on landscape and visual grounds. The applicant's landscape consultants downplay or differ in their assessment. On the impact upon views and visual sensitivity they say that the site makes a limited contribution to the visual setting of the AONB and that, in so far as views from Chinnor Hill are concerned, this site is a part of a wider	16.08.17



					<p>panorama and such views are glimpsed. CCB concurs here with the findings of the South Oxfordshire Landscape Capacity Assessment (2015) that views from Chinnor Hill are matters of 'Medium / High Visual Sensitivity'.</p> <p>We disagree with the point raised in appendix 8 of the LVIA that Chi 17 would '<i>not greatly add to overall impact of new development on the setting of the AONB</i>'. We disagree with the point raised in conclusion that the site is not as sensitive as set out in the Landscape Capacity assessment.</p> <p>Looking at the cumulative impacts now materialising CCB would say, on balance, that this application is harmful to the setting of the AONB</p>	
Land off Lower Icknield Way Chinnor.	SODC	P17/S2915/RM	Approval for Reserved Matters (layout, scale, appearance and landscape) pursuant to Outline application (P15/S0154 /O) for the erection of up to 89	Granted 6.2.18	<p><b>CCB Comments</b></p> <p>The CCB recommends the submission of additional details on lighting, including suitable explanation and justification of lighting layout, design and any relevant technical matters such as luminous flux / light emitted luminous intensity and beam angle.</p>	30.8.17
OS Parcel 2814 Opposite Tiles Farm Asheridge Road Asheridge Bucks	CDC	CH/2017/1648/FA	Change of use of land to a mixed use as a residential caravan site for two gypsy families with a total of up to 3 caravans (including no more than one static	Refused 13 <sup>th</sup> October and further action reported.	<p><b>CCB Objection</b></p> <p>Looking at the high level of protection afforded to an AONB within the Development Plan and in the National Planning Policy Framework at its paragraph 115 as well as in the Countryside and Rights of Way Act at its section 85, this application cannot be deemed to conserve or enhance the landscape. We could not find any visual appraisal in the submitted papers but draw this conclusion on the basis of</p>	30.10.17

			caravan), laying of hardstandin g and provision of means of foul drainage (retrospecti ve)		landscape character and the immediate topography around the application site.  Development here is harmful to the special qualities of the AONB.	
Land off Crowell Road, Chinnor. Amended plans and additional documentation submitted 30th August 2017.	SODC	P17/S1867/FUL	Full planning application for residential developme nt comprising 58 dwellings, new vehicular and pedestrian access, internal roads and footpaths, car parking, public open space, landscapin g, drainage and other associated infrastructur e	Appeal against non- determinati on submitted 7.11.17	<b>CCB Comments</b>  CCB is aware that planning permission was granted on appeal at the neighbouring site for 120 dwellings and that the Inspector made the point that development here ' <i>would not materially affect the setting of the AONB</i> ' (paragraph 20 of the appeal decision). That judgment was based on views out from within the AONB, particularly from Chinnor Hill. CCB would now ask that weight is given to the wider views towards the escarpment from within the Vale and that further details are sought in an updated LVIA, together with commentary. Further, CCB would ask that consideration is given to the cumulative impact on these views when the 120 dwelling scheme is factored in and the impacts arising from what is 3 storey development in respect of scale and mass.  The May 2014 landscape capacity assessment for sites on the edge of larger villages did not consider this site and it remains outside the plan- making process and is not allocated within the Neighbourhood Plan, which has passed the examination stage and is prior to referendum. The May 2014 landscape capacity assessment did accept that the land now the subject of the 120 dwelling scheme had potential to affect views out from and to the escarpment. The current application site shares that landscape	12.09.17

					baseline characteristic. In summary, CCB therefore would ask that the updated LVIA considers the cumulative impacts of both P14/S1586/O and the wider impacts arising from development here and including the 2 and a half to three storey elements, to assess the impact upon the setting of the escarpment when viewed from the north of the current site.	
Hedges Wood, Bradden Lane, Gaddesden Row.	DBC	4/02186/17/FUL	New cricket pavilion, reinstatement of pitch and multi-use community facility, including café, shop and cricket club.	Refused 9.11.18  AONB reasons	<b>CCB Objection.</b>  This application unacceptably urbanises this site with car parking and re-contouring / engineering of the landscape. The frontage of the site would be altered in a way that would erode the special qualities of the Chilterns AONB at this point, principally the 'woodlands, commons, tranquil valleys, the network of ancient routes' (page 7 of the AONB Management Plan) in a sensitive part of this nationally protected landscape.  The current application does not explain why a café, community hub and farm shop is sought in the proposed building.	4.10.17
Land off Wyfold Lane, Peppard Common, Oxfordshire - Planning	PINS	APP/Q3115/W/17/31 80206  SODC application reference: P16/S2887/O	Appeal against the refusal of outline application with all matters reserved, for the erection of 7 Custom Build dwellings	Appeal Dismissed 14.2.18  AONB grounds as reason for dismissal.	<b>CCB Objection</b>  The CCB has concluded that the application is contrary to policy and demonstrably harmful to the special qualities of the AONB in this vicinity. The appellant's second ground of appeal does not withstand the scrutiny of a site visit. ( <i>The proposed development would not cause material harm or impact to the character and intrinsic quality of this part of the Chilterns Area of Outstanding Natural Beauty, and that any perceived harm would be more than outweighed by the benefits of the development</i> ). The appellant's submission (in its paragraph 6.25) that	12.10.17

					tranquilly need not be diminished by development here cannot be correct. Development here would demonstrably erode the tranquillity currently experienced.	
Crosswaters Fam House Icknield Way Eaton Bray Dunstable	CBC	CB/17/04270/FULL	Agricultural building	Granted 29.11.18	<b>CCB Comments</b>  We could not find details of design treatment and therefore recommend that attention and weight is given 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 Design Guide specifically deals with agricultural and other rural buildings and this could appropriately be a matter for planning condition.	18.10.17
The Firecrest PH London Road Wendover	AVDC	17/03798/ALB	Installation of 1 x post mounted sign and 3 x sets of sign written house name letters to the exterior of the building.	Granted 15.11.17	<b>CCB Comments</b>  The existing gable signage (facing northwards towards Wendover) is illuminated (top and bottom lit) with the hanging sign unilluminated. The current application proposes to relocate the hanging sign and add painted signage to the front elevation and south facing wall (facing Great Missenden). CCB understands the need for visibility here but would recommend that the level of illumination is reconsidered and the existing hanging sign, with its historic – traditional form, is retained. For example, the illumination of the front elevation signage would not be needed to attract custom, in view of the other proposed signage. The traditional hanging sign could be replaced with a replica, if weathered (as referred to in the design and access statement) which could include spot lights within its frame.	20.10.17

The Mulberry Bush Farm, Dawes Lane Sarratt	THDC	17/2169/FUL	Erection of agricultural workers dwelling with associated curtilage	Granted 18.12.18	<b>CCB Comments</b>  The current application is a revised version of application as refused on 28th June 2017 with a revised siting and design. In all other respects, as far as the AONB is concerned, this application proposes the same mitigation of impact and rationalisation of site uses as previously put forward by the applicant (confirmed in the supporting planning statement at 3.11 and the landscape and visual impact assessment at 14.8). A proliferation of structures is to be resisted and the wider improvement of the land is a matter that was previously considered in the merits of The proposed new location and design details result in a form and design detail that fits with existing buildings and importantly would not involve any cutting or filling of the landscape, as is to be resisted and as set out in the Chilterns Buildings Design Guide. This location is visually contained and we concur with the conclusions of the LVIA that this would not be visible within the Chess Valley.	21.10.17
Little Studdridge Farm Ibstone Road Stokenchurch Bucks (additional details- October 2017)	WDC	17/05663/OUT	Outline application (including details of access) for the erection of up to 140 dwellings (10 of which will be specialist accommodation for older people) communal	Refused 11.1.18  AONB reason as principal objection	<b>CCB Objection</b>  The applicant's LVIA commentary makes the point in conclusion (at 1.35) that <i>'The proposed development forms a natural extension to the existing settlement, whilst respecting and enhancing the key qualities associated with this part of the AONB and by extension successfully contributes to the Conservation Boards four 'Broad Aims'.</i> The Conservation Board do not accept this point. This	26.5.17  20.10.17 amended plans

			<p>hub for older persons' accommodation, up to 230sqm of retail space (use class A1), public open space and landscaping.</p>		<p>application would be positively harmful to the special qualities of the AONB by the introduction of built development within open land set within a rural and tranquil context. This land is a constituent part of this sensitive and valued landscape to the south of the settlement and the proposal here would lead to a discordant linear extension at odds with the important rural and nationally protected hinterland around Stokenchurch.</p> <p>The applicant's contention in their LVIA commentary that an AONB is not a prohibition on development misses the point here as to the legislative tests in the CROW Act 2000 and the high level policy tests that exist in the Development Plan and in the National Planning Policy Framework at 115 and 116. We would restate the point that no overriding exceptional circumstances have been presented which demonstrate that the development is in the public interest whereas great weight is given to conserving the landscape and scenic beauty of the area</p>	
<p>Land at Britwell Road Watlington</p>	<p>SODC</p>	<p>P17/S3231/O</p>	<p>(1) Full planning permission for the demolition of the existing pig farm and its associated buildings; the erection of 183 dwellings (Use Class C3); the realignment of Britwell Road and the creation of a new</p>	<p>Pending</p>	<p><b>Part CCB Comment</b> on LVIA / <b>Part Objection</b> to raised numbers above SODC Capacity Study</p> <p>The application proposes a greater quantum of housing than contained in the SODC Landscape Capacity Assessment. We have interpreted this site to be WAT 12 (with a nominal housing number of 45 dwellings). The SODC Landscape Capacity Assessment – sites on the edge of the larger villages in South Oxfordshire Report 2015 (Kirkham and Terra Firma) deals with this site and makes the point that it is within</p>	<p>25.10.17</p>

			<p>vehicular access; the creation of a vehicular access from the industrial estate road south of Cuxham Road; public open space; sustainable urban drainage system; landscaping; and other ancillary works, including off-site highway works; and the relocation of a telecommunications mast and equipment; and</p> <p>(2) Outline permission for up to 650sqm of Use Class B1a floorspace with access and all other matters reserved.</p>		<p>the setting of the AONB and development could be visually intrusive in views from Watlington Hill and could urbanise the AONB on the far side of Britwell Road. The 2015 Report arrives at its recommendations on the basis of a reduced development area. 183 dwellings, employment land and a road is too much for the site.</p> <p>The significant desire to integrate this site within the setting of Watlington will be unlikely to be achieved by this increase in numbers. Further consideration of the impact of lighting within the landscape would be required, especially towards the site from the elevated viewpoints from Watlington Hill and in surrounding views within the setting of the AONB. With the increased amount of development now proposed mitigation planting would not obscure the impact of lighting, particularly when viewed from the escarpment.</p> <p>We consider that there is the need for an assessment of cumulative impact, including the major proposals at Chalgrove Airfield, and development at Benson.</p>	
High Heavens Waste Management Complex at the Lower Dano Area High Heavens Household Waste Complex	BCC	CC/95/17	Infilling of approximately 15,000m <sup>3</sup> of inert material and drainage works to create a concrete	Granted 20.12.18	<p><b>CCB Comments</b></p> <p>We would seek a reassurance that any inert fill here and the concrete slab to cap the filled void would not prejudice the longer term use of 'exceptionally' in policy CS 21, for example if the capping was a natural substance / material that would allow a more</p>	14.10.17

			slab to host ancillary waste activities at the 'Lower Dano Area'		<p>sustainable longer term management for the site. The justification for the capping in concrete appears to be in the interests of further waster transfer activities above this membrane. The exceptional nature of the use must weigh heavily against the point that this land is previously developed land. We would seek reassurance as to the longer term restoration of the site and / or removal of the proposed concrete slab after its operational life, should the waste and minerals authority seeks to approve this application. Policy L6 of the AONB Management Plan states that 'Degraded aspects of the landscape should be enhanced including the removal or mitigation of intrusive development and features'. Policy D11states that 'Enhancements of the landscape of the AONB should be sought by the removal or mitigation of intrusive developments'.</p> <p>CCB would make the point here that these longer term objective should be given weight when looking to longer term management and restoration of the site. The managements of HGV traffic should be controlled carefully by management agreements to address AONB Management Plan policy D16 which states that 'The environmental impacts on the Chilterns (including these arising from through traffic) of quarrying and the operation of landfill sites and other waste management facilities within and adjacent to the AONB should be minimised'.</p>	
OS Parcel 8784 & OS Parcel 0006 Mill Lane Monks Risborough	WDC	17/07666/OUT	Outline application (Including details of access) for the erection	<b>Pending</b>	<b>CCB Comments</b>  The proposal is discordant with the scattered settlement pattern that predominates around the scarp hinterland	30.10.17



<p>And De Graven Meadows Askett Village Lane Askett Bucks</p>			<p>of up to 300 dwellings with public open space, landscaping, sustainable drainage system (SuDS) and vehicular access points from Mill Lane and Askett Village Lane and demolition of existing buildings</p>		<p>and the spring line villages. This will be harmful to the views to and from the escarpment and therefore the special qualities of the AONB in this location.</p> <p>The increase of the application site area from 8.2 hectares to 17.39 hectares together with the increase from 170 to 300 dwellings requires a recalibration of that balance. In this case CCB argues that the impact upon the view from Whiteleaf would have a detrimental effect on its special character as well as the views back towards the escarpment from footpaths running across the site and to Askett Village. A linear spread of ribbon development would result. Weight must be attributed to the AONB Management Plan and Position Statement on Setting and the Bucks Landscape Character Assessment area 10.6 Risborough Chalk Foothills within Landscape Character Type (LCT) 10 Chalk Foothills. One of the key characteristics of this landscape character type is as 'Settlement is prominent within the landscape, nestled at the foot of the escarpment, with a historic character, and modern infilling. Smaller linear settlements occur along roads'. The settlements at the foothills of the scarp are scattered along the spring line, which historically has diffused the development pattern.</p>	
<p>Westcroft Stables Slad Lane Speen Buckinghamshire</p>	<p>WDC</p>	<p>17/07641/FUL</p>	<p>Engineering operation to create a parking area of 44 spaces making a total of 82 spaces</p>	<p><b>Refused</b> 29.11.18  AONB reasons</p>	<p><b>CCB Comments</b></p> <p>The current application proposes 44 spaces within a new area and with landscaping and design to create the appearance of a corner copse in the wider setting. The application is supported by a landscape impact assessment and a landscape mitigation in the</p>	<p>31.10.17</p>

					design treatment proposed. We support the idea proposed and recommend use of native hedgerow planting to create the understory. The materials proposed (tarmac for circulation and gravel for parking) could be softer in appearance if consideration is given to a Breedon type surface. These matters could be acceptably discharged by condition. This would allow some consideration of a softer material and its maintenance regime.	
Land Off Arrewig Lane Chartridge Chesham Buckinghamshire HP5 2UA	BCC	CM/71/17	Proposed extraction of approximately 24,000 cubic metres (40,000 tonnes) of clay loam with progressive low level restoration to agriculture	<b>Pending</b>	<b>CCB Comments</b>  (1). The Chilterns Way passes close to the access route and we would propose a reasonable buffer distance between the two of between 5 and 10 metres distance. (2). An appropriate restoration condition should be based on content within the supporting planning statement and submitted plan B25/HGM/03/08. (3). We have seen the holding comments submitted by Natural England, which address landscape impacts upon the AONB. The planning statement at its annex C deals with landscape assessment matters. Wider views within the landscape are acknowledged at paragraph 4.9 of the planning statement. It would be beneficial to know the wider impact on surrounding views, accepting the nature of proposal and the topography involved.	31.10.18  31.1.18

APPENDIX 5**New CCB Responses on Planning Applications since Last Planning Committee**

Location	LPA	Ref. No.	Development	Status	Summary of the Board's Response (please contact the Board for more detailed information if this is required)	Date
At Great Kimble Church Of England School Church Lane Great Kimble Bucks	BCC	CC/0121/17	The demolition of 'Springwood Cottage', which is to be replaced by a new, single storey Hall and 2 classroom teaching block. The existing driveway of 'Springwood Cottage' is to be replaced with new staff parking and drop-off zone. New hard and soft landscaping is also proposed, to facilitate external teaching	Pending	<p><b>CCB Comment</b></p> <p>The resulting design takes a contemporary approach to its design idiom and adds appropriate use of Chilterns materials and vernacular aspects to create a high quality design. The CBDC goes on to say that (paragraph 3.64) that 'Only use materials which are traditional to the Chilterns. Materials with colours and textures alien to the Chilterns such as stone from other areas, yellow brick, plastic, or brightly coloured cement and concrete based products cannot help to blend a new building with the countryside or the traditional character of local villages. Particular care is needed when using ornamental detailing such as coloured brick banding and unusual window shapes'. We agree with the point made in the Design and Access Statement that the design thinking has taken into account the AONB location and the use of decorative brick detailing, gable detailing and slate roofing to match the existing school creates an appropriate extension that respects its context.</p>	17.1.18

Heatherlands Naphill Common Naphill	WDC	17/05586/FUL	Demolition of existing dwelling and erection of 3 x 4 bed detached dwellings with double detached garages and creation of new access	Pending	<p><b>CCB Comment</b></p> <p>We could find no impact assessment by a suitably qualified practitioner within the papers and the submitted ecology wildlife checklist is incorrect where it answers 'no' in respect of proximity to the SPA and SSSI. The application lacks, within either the submitted design and access statement or in a separate document, a suitable landscape and visual impact assessment to assess the visual impact on the AONB beyond the urban edge. The AONB washes over all of Naphill, including both Naphill Common and the adjoining urban area.</p> <p>We note from the papers that there has been an earlier application under reference 14/06298/OUT. It is clearly preferable in the interests of habitat protection that no further vehicular access is created across Naphill Common and in any event the application lacks any appropriate assessment as to impact or any assessment of a significant effect. This would mean that the application is deficient in respect of the EU Habitats Directive 92/43/EEC and therefore the Habitat Regulations 2010 as would apply in England. CCB is aware that Natural England has raised objection on grounds of a lack of information.</p>	2.1.18
Land at and To The Rear Of 206 - 208 Chartridge Lane, Chesham Bucks	CDC	CH/2017/1959/F A	Re-development of site comprising 5 dwellings (4 with integral garages), associated hard landscaping, parking and creation of vehicular access	<p><b>Refused</b> 12.1.18</p> <p>AONB reasons</p>	<p><b>CCB Objection</b></p> <p>Part AONB/ part AONB setting. No Landscape and Visual Impact Assessment prepared in accordance with the Landscape Institute's Guidelines (GLVIA 3rd edition) so there is insufficient information on which to determine the impacts.</p>	4.1.18

					<p>The form of development appears cramped and the design inappropriate, with tight regularly spaced housing which would appear at odds with the rural location. The design is not rooted in the Chilterns Buildings Design Guide. There is a likelihood of setting an undesirable precedent for other backland development, stepping down the slope of the Pednor valley, which has a high scenic beauty and unspoilt character. Development peeping over the brow would harm the experience of those enjoying the beauty of tranquility of this valley in the AONB. The glazed three storey elevations overlooking the valley would cause light spill at harm dark skies, visible through vegetated screening at night as glowing boxes of white/yellow light. Future residents would be likely to want to open up views to the valley by clearing or thinning the vegetation. The creation of landscaped lawns over time to replace the remaining orchard trees would also be undesirable and harm the character of the AONB. Traditional Orchard is a historically important habitat of significance to the AONB, see Chilterns AONB Management Plan. There is a belt of Traditional Orchard, a Priority Habitat (see <a href="http://www.magic.gov.uk/MagicMap.aspx">http://www.magic.gov.uk/MagicMap.aspx</a>) close by which this form a network with, much has already been lost and any further erosion of this habitat type in this belt should be avoided, the habitat should be expanded, joined up and restored.</p>
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Wyfold Lane Rotherfield Peppard	SODC	P17/S3940/FUL	One dwelling	Withdrawn 16.2.18  Appeal decision on 14.2.18 dismissed a wider scheme	<p><b>CCB Objection</b></p> <p>This application covers predominantly the same site area as that proposed for 7 dwellings as refused under reference P16/S2887/O and now the subject of an undetermined appeal under reference APP/Q3115/W/17/3180206. It raises similar issues and CCB raises the same fundamental objection in that the application is contrary to policy and demonstrably harmful to the special qualities of the AONB.</p> <p>The Local Planning Authority may want to await the Planning Inspector's determination of the current appeal before determination of this application. The points raised in the supporting Design and Access Statement that the proposal would follow design principles in the Chilterns Buildings Design Guide does not overcome the planning principle. (Note that decision was dismissed).</p>	7.12.17
Land Adjacent To Nash Lee Lane Wendover	AVDC reference	17/04394/APP	Change of use from snail breeding to outdoor childcare & education. Installation of One Shepherd's Hut, one yurt, three wooden cabins (two of these are small, each containing one composting toilet).		<p><b>CCB Comments</b></p> <p>The application proposes a series of new structures in replacement of an existing use. We would recommend some clarification of what will be removed following any change of use. The application forms set out that four sheds and a large pallet and netting structure would be removed, however we could not determine if this represents all of the existing use. It may well be that these are matters for an appropriate planning condition, with the background reasoning to ensure the site is maintained in a way that conserve the special qualities of the AONB landscape within which it is located.</p>	15.12.17

Land at Wood Lane Woodcote	SODC	P17/S3701/O	Outline planning application for the erection of 23 residential dwellings (use class C3), vehicular access from Wood Lane, associated parking, landscaping, open space and drainage works	Pending	<p><b>CCB Objection</b></p> <p>The proposal appears similar in its planning merits to the South of Bridle Path application for 65 homes, also at Woodcote, which was refused under reference P16/S3306/O on 5th January 2017 and with reason one stating that the application site lies beyond the edge of the settlement of Woodcote and is not a site allocated for housing within the Woodcote Neighbourhood Plan. The principle of the development is therefore unacceptable. Furthermore, the proposal would constitute a major development within the Chilterns Area of Outstanding Natural Beauty (AONB) and there are no exceptional circumstances that are in the public interest that would justify this major development within the AONB, contrary to policy.</p>	2.11.17
Lilas Wood, Hastoe near Tring	DBC	4/00224/17/F UL  APP/A1910/C /17/3182746	Retention of existing structures and material change of use of land to allow for use as a wedding venue (15 per year)		<p><b>CCB Comments</b></p> <p>CCB would make the point that discussions of planning merit here must address the special qualities of the AONB which abound in the appeal site and its vicinity. Local Plan Policy 97 and the purposes of a conservation board include the economic and social well-being of the area and its communities and the purpose of increasing the understanding and enjoyment by the public of the special qualities of the AONB. Great weight must be given to these qualities, in accord with the policy in the NPPF at 115 and the duty of regard in section 85 of the CROW Act. CCB sets these out to assist in the discussions as to merit and remedy as would be anticipated in an enforcement notice appeal.</p>	14.11.17

Markyate JMI School, Cavendish Road, Markyate Herts.	HCC	PL/0888/17	Proposed application for the installation of a 4 - bay modular classroom building	Pending	<p><b>CCB Comments</b></p> <p>In this case the additional modular classroom is located just to the west of the existing building and within an existing playground area. It falls within the developed curtilage of the site and does not extend the school area towards the open AONB landscape beyond and to the north. The proposal results in a modest impact on the surrounding landscape but aware of the high sensitivity of an AONB landscape we support the need for enhanced landscape planting to further screen any wider impacts. The Design and Access Statement confirms that permission is sought for 6 years and that would need to be reflected in the consent, presumably by imposition of a planning permission.</p>	17.1.18
Peppard Road and Kiln Road Sonning Common	SODC	SODC reference - P16/S3630/O Planning Inspectorate appeals reference: APP/Q3115/W/17/318599 7	Planning appeal against refusal of planning permission for residential development of up to 245 residential dwellings (including up to 40% affordable housing), structural planning and landscaping, informal public open space and children's play areas, vehicular	Appeal in progress  Inquiry for 1 <sup>st</sup> May 2018	<p><b>CCB Objection</b></p> <p>The CCB asks that weight is given to the nature of the landscape character type here in light of a potential for future boundary review.</p> <p>CCB has submitted a case to Natural England and still awaits its decision on the commencement of any new boundary review. Any review will require a detailed evaluation of landscape character and it must be common ground between all parties to the forthcoming appeal that the appeal land falls within a National Landscape Area and a Local Landscape Type that share the same landscape character as the Chilterns AONB in the vicinity of the appeal site.</p> <p>CCB's principal submission to the Inspector is to give weight and cognisance to the potential for a boundary review and to avoid prejudicing its outcome would</p>	3.1.18



					require that this appeal is dismissed.	
Land at Kennylands Road Sonning Common	SODC	SODC reference - P16/S3142/O Planning Inspectorate appeals reference: App/Q3115/W/17/3183391	Planning appeal against refusal of planning permission for the erection of up to 95 dwellings including affordable housing; new public open space; landscaping; surface water attenuation; access with Kennylands Road; services, utilities and associated works (as altered by amended plans and additional information received from the applicant	Appeal in progress  Inquiry for 18 <sup>th</sup> April 2018	<p><b>CCB Objection</b></p> <p>This proposal is harmful to the special qualities by the introduction of an excessive volume of built development within open farmland bordering the AONB, itself sufficient to erode the tranquillity of this sensitive and valued landscape. This setting relationship was accepted as a material consideration by the Inspector in the 20th March 2012 appeal decision for up to 50 houses on the land to the immediate north (APP/Q3115/A/11/2159119).</p> <p>Paragraph 23 of that decision stated that <i>'It is acknowledged that the perception of users of the public footpath is of high sensitivity. In my assessment, the appreciation of the setting of the village and of the edge of the AONB would be significantly adversely affected by the proposed number and layout of buildings. The same would be true, but to a lesser degree, of the path immediately adjoining the boundary, which also appears to be well used despite its informal status. Here there would be some degree of visual screening but the experience of using the path with development close to the far side of the hedge would be devalued'</i>.</p> <p>The allocation of the land to the immediate north is included in the Neighbourhood Plan as site SON 5 for fewer dwellings (22-Kennylands Paddock) also includes a substantial green infrastructure landscape buffer (in the Neighbourhood Plan Policy HS3).</p>	22.12.17

					Originally the CCB did not raise objections to the 2012 appeal. At that time CCB commented on detailed assurances that were required at reserved matters stage. The Inspector concluded that the harm at outline stage was sufficient to justify refusal. This appeal decision is now a material matter	
Chiltern Farm Barn Main Road North Dagnall Bucks.	AVDC	AVDC application reference: 16/04099/AP P Planning Inspectorate appeals reference: APP/J0405/W /3187964	Conversion and alterations of existing barn to create 5 dwellings with access, parking and gardens.	Appeal in progress By written reps	<p><b>CCB Objection</b></p> <p>CCB supports the refusal of planning permission by AVDC. The balancing exercise as contained in the officer's report deals with the AONB where it concluded that the proposal would result in 'the urbanisation of the open countryside, the Green Belt and the Chilterns AONB'. The Local Planning Authority did not refuse consent on AONB grounds; however it remains the case that the duties in the CROW Act and the '<i>great weight</i>' attributed to the conservation of landscape and scenic beauty are matters to be discharged in any determination. The appellant in their statement of case accepts this point and they address AONB matters under their 'other considerations' section.</p> <p>The impact on the special qualities of the AONB is relevant. In this case those qualities being the predominantly rural – pastoral landscape here which links to the rounded chalk hills of the escarpment and the woodland blocks between. Self-evidently it is a farmed landscape within the Chiltern Hills and with great weight given to these special qualities we have concluded that residential development in this case would be in conflict with those objectives.</p>	11.1.18

Rumbolds Pit, Eyres Lane, Ewelme, Wallingford, OX10 6HF	SODC	OCC reference: MW.0098/17	Change of use for the storage of recycled material on land to the south of the primary working area. In addition to storage of recycled materials it is proposed to store empty waste skips in the ancillary area	Pending	<p><b>CCB Objection</b></p> <p>CCB would ask that great weight is given to policy protection and to the sites location within South Oxfordshire Character Area 5: Eastern Vale Fringes which states (page 39 of the report) that <i>'Quarries and landfill sites are examples of land uses which have disrupted the natural pattern and character of the rural landscape. Here, intervention to reconstruct a more sympathetic character and to mitigate adverse landscape impacts would be desirable'</i> and continues (under planning and development pressures) that <i>'the semi-enclosed rolling downs landscapes benefit from a more intact landscape structure and the strong backdrop of the Chilterns escarpment, but their scenic quality (part AONB) and visual prominence makes them sensitive to development'</i>. No attempt is made in this application to assess visual impact against the highly sensitive landscape character of the AONB and in accordance with the Guidelines for Landscape and Visual Impact Assessment produced by the Landscape Institute.</p>	24.11.17
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<p>Shirburn Road Watlington</p>	<p>SODC</p>	<p>SODC: P18/S0002/O</p>	<p>Outline application for up to 37 Assisted Living Units, and provision of a Care Home (All C2 Use), 4 staff accommodation units and site access (all other matters reserved for future consideration</p>	<p>Pending</p>	<p><b>CCB Comments.</b></p> <p>The applicant's LVIA, rightly assumes that setting is material. The relationship between the wider open countryside and the escarpment is evident here from views from the road and lay-bys along the B4009. The immediate landscape to the south-east of open rolling downlands forms the setting to the escarpment. The wider landscape is contained within the National Character Area 110 and the setting here is acknowledged as a landscape receptor in the supporting papers. In the summary of The National Character Area 110 part of the landscape character is denoted as a patchwork of mixed agriculture with woodland, set within hedged boundaries.</p> <p>If a comprehensive and longer term solution is to change the use to assisted living then we would recommend the design of the built form along the south eastern boundary is reviewed. Further that a planning condition is applied to the land edged blue to remediate the land to an open and undeveloped planted area, to improve the relationship to the boundary here. As currently constituted the application does impact upon the AONB boundary and 15 year landscape mitigation can be obviated by more appropriate design treatment dealing with the layout and built-form and assured removal of the recycling area. This is predicated on the assumption that the planning principle is established here.</p>	<p>2.2.18</p>
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Land at Woodview Nurseries Wiggington Herts	DBC	4/03275/17/FUL	Change of use from nursery to residential redevelopment to provide four new dwellings.	Pending	<b>CCB Holding Objection</b>  CCB reported that the current application cannot progress and it may be prudent for the applicant to resolve Green Belt policy matters first before continuing, after which AONB matters must be addressed. Within the remit of the National Planning Policy Framework this site would not be deemed to be previously developed land, as set out in the glossary definition. There is no Landscape and Visual Impact Assessment prepared in accordance with the Landscape Institute's Guidelines (GLVIA 3rd edition) so there is insufficient information on which to determine the impacts.	2.2.18
The Wycliffe Centre Horsleys Green Bucks	WDC	17/08285/FUL	Demolition of all existing buildings and structures and redevelopment of a supported living community for older persons (Class C2) comprising 167 supported living units, clubhouse incorporating communal facilities, landscaping, plant room, refuse stores and car parking.	Pending	<b>CCB Comment</b>  The AONB Management Plan at its policy L6 sets out that ' <i>Degraded aspects of the landscape should be enhanced including the removal or mitigation of intrusive development and features</i> '. This application proposes a comprehensive redevelopment of the site with a landscape approach based upon detailed analysis of character areas and a design ethos and approach involving the application of the Chilterns Design Guide to the design iteration and use of materials.	2.1.18
Century Park Luton	LBC	17/02300/EIA	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 incorporating a new junction on	Pending	<b>CCB Holding Objection / Part comment</b>  The economic development of related airport land and travel to the airport itself has potential to exert an impact by a combination of vehicular traffic (in this case) and in respect of tranquillity impacts (as air traffic movements increase, as is projected in the 2012 decision to increase operations to 18 mppa). The combination of Environmental	21.1.18

			<p>the A1081, alterations to the existing Airport Way roundabout, alterations to Frank Lester Way, a newly created access from Eaton Green Road.</p>		<p>Impact Assessment and Sustainability Appraisal for applications and plans/programmes respectively manifests that a significant environmental impact should be assessment and mitigated or an alternative location proposed.</p> <p>The Design and Access Statement (at its page 16) deals with the principal driver of <i>'unlocking the site'</i> by creating a new access that seeks to avoid access to the airport and provides a new direct access to the business park. It states that (paragraph 6.1) that traffic is directed away from Eaton Green Road but that there will be a new road from the eastern end of the Century Park Access Road (CPAR) which links to Eaton Green Road. We have noted that a great deal of attention is placed on avoiding any burden on Eaton Green Road and promoting access routes to the east. Paragraph 4.43 of the supporting planning statement accepts that the CPAR links to Eaton Green Road.</p> <p>Should the NHDC housing allocations progress then their principal route into Luton will be via Eaton Green Road, travelling to and from a place of work. With up to 3724 full time job equivalents proposed at Century Park, then this routing direction will become even more popular than it currently is. Luton Local Plan Policy LLP 6 (viii) sets out modal shift targets and promotes sustainable transport modes and Policy LLP 31 (B) (i) to minimise the need to travel. CCB would ask that weight is given to these objectives as the unresolved nature of the NHDC allocations to the east is of material importance. In</p>	
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					<p>effect if they progress to implementation these allocations impact considerably on the Council's ability to deliver these policies. From our standpoint this means that should these allocations not proceed and the candidate status of the land to the east of Luton does progress in the future to an extended AONB boundary, then the need to avoid any increased use of Eaton Green Road will impact upon the use of roads via Cockenhoe and in the Lilley Valley area, which is deeply rural and tranquil. The applicant's Environmental Statement at its table 4.1: Cumulative Schemes includes an assessment impact that includes both of these allocations.</p> <p>We could not find in the modelling within the Transport Assessment, any factoring that involved the NHDC allocations. Also, that modelling does not appear to include the impacts arising from the NHDC allocations and their overall implications on the Lilley Valley. We recommend that this assessment is added to the assessment of cumulative impacts.</p>	
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APPENDIX 6**Current Live CCB Planning Application Casework**

Location	LPA	Ref number	Development	Deadline
New Relief Road, Beaconsfield, Bucks, HP9 2ES	BCC	CC/0012/18	New relief road variation of CC/65/16 conditions 2 approved plans and 23 landscape mitigation	20.2.18
Chiltern View Nurseries, Wendover Road, Stoke Mandeville	BCC	CM/0006/18	Operational development for introduction of concrete perimeter walls	12.4.18



**Item 9      AONB Management Plan workshop on Planning section**

**Author:** Lucy Murfett Planning Officer

**Lead Organisations:** Chilterns Conservation Board

**Resources:** Staff time, Planning Committee time

**Summary:** A report to introduce the workshop on the AONB Management Plan review.

**Purpose of report:** To involve the Committee in the early stages of the AONB Management Plan review.

**Background**

1. An AONB Management Plan must be reviewed every five years (Countryside and Rights of Way Act 2000 section 89). The current [Chilterns AONB Management Plan](#) covers the period 2014-2019 and the process of reviewing this plan has commenced. A notification letter was sent in October 2017 to local authorities and Natural England (under section 90 of CRow Act), a launch event for local authority senior officers, Natural England and DEFRA was held on 16<sup>th</sup> November 2017, and a Planning Forum workshop was held on 22<sup>nd</sup> February 2018 with planners and stakeholder from across the Chilterns AONB.
2. The current plan contains a chapter on Development. The review provides an opportunity to consider the content, policies and format of that chapter, which is proposed to be expanded to cover both Development and Transport. A workshop will be held at the meeting to gather views on the status, format and policies that should be contained in this chapter.

**Recommendation**

1. **That the Committee provides feedback through the workshop for the revised Development and Transport section of the Chilterns AONB Management Plan.**