



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 10.30 a.m. Wednesday 20th November 2019

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

Agenda

1. Apologies	10.30 – 10.31
2. Declarations of Interest	10.31 – 10.32
3. Minutes of Previous Meeting	10.32 – 10.38
4. Matters Arising	10.38– 10.45
5. Public Question Time	10.45 – 10.50
6. Glover Review on Planning and opportunities for joint work	10.51 – 11.30
7. Strategy discussion on Transport in the Chilterns	11.31 – 12.15
8. Planning Application response and updates	12.15 – 12.35
9. Development Plans responses and updates	12.35 – 12.50
10. Site visit introduction – West’s Yard (now called Saint’s Hill)	12.50 – 12.55
11. Any urgent business	12.55 – 12.59
12. Date of Next and Future Meetings	12.59 – 13.00

**The meeting will be followed by an optional site visit to
Saint’s Hill, Saunderton, HP14 4HL**

Item 3 Minutes of Previous Meeting

Author: Lucy Murfett Planning Officer

Lead Organisations: Chilterns Conservation Board

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

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

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

Background

1. The draft minutes from the meeting on Wednesday 17th July 2019 are attached (at Appendix 1) for approval.

Recommendation

1. **That the Committee approves the minutes of its meeting which took place on 17th July 2019.**

Appendix 1

**MINUTES OF THE MEETING OF THE PLANNING COMMITTEE OF THE CHILTERN'S
CONSERVATION BOARD FOR THE CHILTERN'S AREA OF OUTSTANDING NATURAL
BEAUTY**

**held on Wednesday 17th July 2019 at The Chilterns Conservation Board office, 90
Station Road, Chinnor OX39 4HA commencing at 10.10 AM**

BOARD MEMBERS PRESENT

Member	Appointing Body
Appointed by Local Authorities	
Cllr Hugh McCarthy	Wycombe District Council
Cllr Lynn Lloyd	South Oxfordshire District Council
Cllr Richard Newcombe	Aylesbury Vale District Council

Appointed by the Secretary of State	
Colin Courtney	Secretary of State
John Nicholls	Secretary of State- Chairman
Elizabeth Wilson	Secretary of State- by phone

Elected by Parish Councils	
Cllr Alison Balfour-Lynn	Hertfordshire from 10.30
Cllr Sue Biggs	Oxfordshire

Co-opted Members	
Chris Hannington	
Paul Hayes	

Officers present-	
Elaine King	CCB Chief Executive Officer
Lucy Murfett	CCB Planning Officer

And others	
Deirdre Hansen	Minute taker

The Planning Officer welcomed the new members and the CCB's new CEO.

364. Election of Chairman and Vice-Chairman

John Nicholls was proposed, seconded and unanimously elected to serve as Chairman until the AGM in 2020.

Elizabeth Wilson was proposed, seconded and unanimously elected to serve as Vice- Chair until the AGM in 2020.

The Chairman thanked and commended the Planning Officer on her work. He thanked Elizabeth Wilson for taking on the task of Vice-chair.

365. Apologies for absence

Apologies were received from Cllr Nick Rose, Chiltern District Council and Mike Stubbs CCB Planning Advisor.

366. Declarations of Interest

Cllr Richard Newcombe declared an interest as the Vice-Chairman of the AVDC Strategic Management Group, in planning application 19/00399/APP Arla Foods Ltd

367. Minutes of the previous meeting

The minutes of the meeting held 6th March 2019 were approved as a true record and signed by the Chair after the amendment in item 358 2nd paragraph relating to Paul Hayes of “register” to “registered”.

The minutes of the closed meeting were also approved and signed by the Chairman.

368. Matters Arising from the minutes

There are 2 vacancies for co-opted members, members were encouraged to consider possible occupants for these vacancies.

369. Public Question time

No public present.

370. Update on Great Western Project

The Planning Officer gave an update on the settlement agreed with Network Rail of the compensation and mitigation for the harm resulting from the now completed rail electrification project on the Great Western Mainline though the North Wessex Downs and the Chilterns AONBs.

The project will run for 5 years, with £750,000 for mitigation planting and £3m for projects to address the residual harm by enhancing the AONBs in this rail corridor. A steering group will steer the project made up of the Chilterns Conservation Board, the North Wessex Downs AONB Partnership and the Railway Action Group. The CCB will employ two members of staff to lead this project, line managed by the Planning Officer. Recruitment will start soon.

Members made suggestions and discussed various possibilities. It was noted that lessons had already been learned from the Great Western Electrification Project regarding design of overhead line equipment in protected landscapes, and the Planning Officer is bringing that learning to the HS2 Review Group.

10.30 Cllr Alison Balfour-Lyn arrived.

The project seeks to restore and enrich the landscape and communities in the setting of the railway track impacted upon electrification works at the borders of the nationally important Chilterns and North Wessex Downs AONBs leaving a legacy of a more beautiful valued and visited place.

The Planning Officer was thanked for her hard work in achieving this success to restore and enhance the AONBs following the harm done.

1. The Committee NOTED the update on the new project and PROVIDED suggestions.

371. Chilterns Buildings Design Awards 2019 Update

The Planning Officer reported to the Committee on the 2019 Chilterns Building Design Awards. There had been 19 entries of which 7 had been shortlisted.

The overall joint winners were: River Thames Footbridge and Incurvo.

The River Thames Footbridge appears to have been effortlessly dropped into the landscape, opening up great views of the riverscape and creating a new and fully accessible recreational amenity.

Incurvo is a virtually carbon neutral dwelling, which with its landscaped gardens gracefully and sinuously blends into the Chilterns landscape.

Highly commended: Dock Farm Restoration.

The judges commended the restraint used by the architects in the restoration of this Grade II listed 17th century former farmhouse.

This event is now run bi-annually with the deadline for entries for the next awards being 1st March 2021.

The members discussed briefly the criteria used in this award, the award is judged by the criteria in the Chilterns Buildings Design Guide.

It was suggested to that the criteria will be reviewed in the next year before entries to the next award are invited to include, for example, minimising light pollution to protect dark skies.

1. The Committee NOTED the update.

372. Light Pollution

The Planning Officer invited members to consider light pollution, increase public awareness of this issue and how to progress on the matter.

The CCB have included new policies on light pollution in the Management Plan.

The Planning Officer and Planning Advisor have offered advice to planning applicants on lighting and recommended model lighting conditions, but lack the resources to take this further.

Members discussed and it was agreed that the CEO and the Planning Officer will bring suggestions to the next meeting.

The Chairman thanked all members for their contributions.

1. The Committee DISCUSSED light pollution and it was AGREED that the CEO and the Planning Officer will bring suggestions to the next meeting.

373. Planning Applications Update

The Planning Advisor had provided the Committee about and sought approval for, the 19 responses and 2 appeal representations, 1 scoping opinion response and 1 set of comments to a local authority on a pre-application proposal that have been made by the Planning Advisor under delegated powers in connection with Planning Applications as detailed in the agenda.

The Chairman asked if it would be possible to have more detail on the success rate and outcome of planning applications. This is to be considered, although time is limited.

It was noted that the Planning Officer and Planning Advisor comment on many more applications than in the past and that resources are stretched.

Cllr Richard Newcombe left the meeting as he had declared an interest in planning application 19/00399/APP

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

- 19/00399/APP Arla Foods Ltd. Aston Clinton

Cllr Richard Newcombe returned to the meeting

- 17/08051/FUL White House Farm, Cryers Hill.
- CC/0013/19 Amersham School, Stanley Hill, Amersham.
- CC/0012/19 Chiltern Hills Academy, Chesham
- 19/06137/FUL Askett Nursery, Aylesbury
- 19/05281/OUT Gomm Valley Reserve site, High Wycombe
- 18/S2451/FUL North Barn, Ewelme
- P19/S1536/FUL The Springs Golf Club, Wallingford
- P19/S1476/PEJ Little Sparrows Sonning Common
- CB/19/00887/FUL M1 junction 11a to A6, Streatley. The Planning Officer has asked for this application to be called in by the Secretary of State.

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

374. Development Plan Responses

The Planning Officer informed the Committee that she had submitted representations on 16 consultations of which 4 were local plans, 2 neighbourhood plans, 3 County level strategic plans, 1 local list, 5 airport expansion consultations and 1 road proposal consultation.

Cllr Hugh McCarthy declared an interest in the Wycombe Local Plan Proposed modifications of the Wycombe District Local Plan as a member of Wycombe District Council.

Members discussed the various representations made.

The Planning Officer and Planning Advisor were thanked for their hard 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.**

375. Urgent Business

- a. The request was made to start future meetings at 10.30 instead of 10.00 am

376. Date of the next meeting Wednesday 20th November 2019 at CCB offices at 10.30 am.

Further meetings were agreed: Wednesday 4th March 2020, 15th July 2020, 18th November 2020.

The Chair.....

Date.....

Item 6 Glover Review on planning and opportunities for joint work**Author:** Lucy Murfett Planning Officer**Lead Organisations:** Chilterns Conservation Board**Resources:** Staff time**Summary:** A summary of the recommendations on what the Glover Report recommends for planning in the Chilterns, with opportunity for discussion on the proposals for a Chilterns National Park and single statutory local plan for the Chilterns.**Purpose of report:** As above**Background**

1. The Landscapes Review (known as the Glover Report or Glover Review after its Chairman Julian Glover) is an independent review commissioned by DEFRA on whether the protections for National Parks and AONBs are fit for purpose. It was published in September 2019 and is available [here](#). The Landscapes Review coincides with the 70th anniversary of the National Parks and Access to the Countryside Act 1949 which was the start of nationally protected landscapes. It is an inspiring and encouraging read. It makes some radical suggestions for an overhaul, so that protected landscapes serve the nation better, with bigger ambitions to be happier, healthier, greener, more beautiful and open to everyone. For the Chilterns it suggests National Park status and the need for a single local plan covering the Chilterns. The proposals in the Glover Report are only recommendations and their implementation will depend on the Government's response to the Glover Report, which will be produced after the general election. The Interim Response from former Secretary of State at DEFRA Michael Gove encourages ambition, enthusiasm and debate. The Chilterns Conservation Board has issued a news item welcoming the Glover Review, see CCB website [here](#).
2. Some general planning-related extracts from the Glover Report:
 - The current cumbersome title 'AONB' should be replaced with 'National Landscapes'
 - What are now AONBs should be strengthened, with increased funding, governance reform, new shared purposes with National Parks, and a greater voice on development.
 - "Nor does 'conserve and enhance' reflect the reality that much of our biodiversity is badly damaged; simply sustaining what we have is not nearly good enough... We propose a new set of wording applicable to both National Parks and AONBs to read as follows: "Recover, conserve and enhance natural beauty, biodiversity and natural capital, and cultural heritage."

- “First, the requirement of ‘regard’ to landscapes’ existing purposes should be strengthened to one of ‘furthering’ the reformed purposes.”
 - “Second, a requirement should be established in law on relevant bodies to support the development and implementation of national landscapes’ Management Plans”
 - On monitoring: “They should show not just what is present across the whole of our national landscapes but what is not – i.e. what is not there today, but could be.”
3. The Glover Report goes on to make some specific recommendations about the Chilterns, more so than for any other of the 34 AONBs in England. The report addresses the huge development pressures on the Chilterns, the relationship with the Ox-Cams arc, and calls for increased funding, purpose and planning powers for AONBs (see pages 119-120, 129, 137-138). Some key extracts:

“Some national landscapes – the Chilterns for instance – risk changing very fast as a result and mostly not for the better. We shouldn’t just accept this as sadly unavoidable. It should shame our generation to leave uglier, less liveable human settlements than those left for us by the generations which came before.” (page 102)

“The Chilterns.

In July 2018, the Chilterns Conservation Board submitted a request to Natural England for a review of the designation and requested that National Park status be considered.

We see very strong merit in this. Designation as a National Park should not be a block on growth in the wider region, but a natural counterpart to it. The aim should be to enhance natural beauty and nature in an area of high landscape value, while giving due recognition to the importance of the Chilterns for access and enjoyment. It is precisely because the government has made big strategic choices for the region – such as HS2, the Oxford Cambridge growth corridor, the Heathrow expansion and new homes – that it should also consider a big strategic choice now in favour of a new National Park for the Chilterns.

The Chilterns is an obvious choice for National Park status. It is already designated as an AONB. It more than meets the criterion for recreational opportunity, with 10m people living within an hour’s drive, many just a tube ride away. That number will increase given developments around its boundaries and in the Oxford Cambridge corridor. It also boasts a 1,200 mile network of rights of way and is easily accessible to the increasing populations around its boundaries.

The Oxford Cambridge Arc mirrors the west and northern boundaries of the AONB and is due to see another 1m more homes – an increase of more than 25% – by 2050. The Oxford Cambridge Expressway and East West Rail are also planned.

People who benefit from these will also benefit from a new National Park, and in turn we think some of these developments should be able to meet many of the costs.

Money has been allocated to develop a local natural capital planning approach in the Oxford Cambridge Arc but this must take in the surrounding areas of importance, including the Chilterns AONB, and work with other projects such as HS2 which is already funding environmental work in the Chilterns.

Should the Chilterns remain an AONB there is a strong case for the Conservation Board to be given increased resources, and, if other recommendations are accepted in this report, further powers to address the specific challenges that it faces. Namely, it currently works with 17 local authorities, and a multitude of local plans. A single statutory local plan, as we discuss in the next chapter of this report, could manage some of the pressures. But we think National Park status offers wider benefits and should be pursued as the preference.” (pages 119-120)

4. A Planning Forum meeting will be held on Tuesday 19th November attended by planning officers from the constituent local authorities and stakeholders including Natural England, the Environment Agency, Chiltern Society and CPRE. This follows on from the Board’s Partnership Event held at the Boxmoor Trust on 10th October, which included a summary of Glover’s recommendations for the Chilterns. The Planning Forum will be an important opportunity for officers to explore and discuss pros and cons of different options of closer working on planning for the AONB. These include a Chilterns National Park, a single statutory Chilterns Local Plan for the AONB (following the example of the [new Arnside and Silverdale AONB plan](#)) and ideas like other joint thematic work on transport (see Item 7). The timing with the forthcoming creation of the Bucks unitary authority in April 2020 also provides an opportunity for setting things up differently, if there is support. The Planning Officer will provide an update from this session.
5. This work ties in well with implementing the new [Chilterns AONB Management Plan 2019-24](#), which contains policy GP1 General Policy 1 “Explore the case for and against the Chilterns having enhanced status or being designated a National Park.” It also contains as a Key Action 1 in the Development chapter: “Work together to ensure all development plans covering the Chilterns conserve and enhance the AONB, for example by incorporating the Chilterns AONB model policy and exploring the scope for joint development plan documents for the AONB”.

Recommendation

1. **To note the update on the Glover Report and provide a steer on next steps and best options for planning in the Chilterns AONB.**

Item 7 Strategy discussion on Transport in the Chilterns

Author: Lucy Murfett Planning Officer

Lead Organisations: Chiltern Society, Chilterns Conservation Board

Resources: Staff time, Planning Committee member time, partner time

Summary: An update on emerging joint work with the Chiltern Society on transport in the Chilterns.

Purpose of report: To provide an opportunity for partners at the Chiltern Society to update the Committee on emerging joint work on transport, and seek Committee's feedback and input.

Background

1. At the local level, transport strategy is the realm of the Highways Authorities (the County Councils and Unitary Authorities). It has been ten years since CCB undertook joint work with the Chiltern Society and all the Highways Authorities covering the Chilterns to prepare a joint guidance document [Environmental Guidelines for the Management of Highways in the Chilterns](#). This is still a very useful and relevant document for designing and assessing road upgrades in a way that is sympathetic to the Chilterns special landscape. However, it a design guide and does not address transport strategy.
2. The Chiltern Society approached CCB in the summer to explore new joint working on transport strategy issues. A small initial workshop and other meetings have been held, and the Chiltern Society has usefully collated set out thinking in a paper entitled 'Chilterns Transport Planning: a common approach – Discussion Paper'. Our Chiltern Society partners will brief the Committee on our joint evolving thinking and seek advice and suggestions.
3. A Chilterns-wide strategy looking across county borders could provide a focus on the AONB for the first time. It could plan the best future for the road and rights of way network in the Chilterns, and seek to balance travel needs with conservation. It could potentially look at the hierarchy of routes, balance the needs of users of different modes of travel or types of journey, and include spatial map-based proposals. In other protected landscapes, like the Lake District National Park, proposals are being considered to tackle congestion and air pollution, while balancing the needs of residents and visitors. Ideas are being discussed like road pricing or congestion charging, and establishing some small car-free valleys prized for quiet recreation. No two landscapes are the same, and joint work would need to identify what are the specific transport issues for the Chilterns, what challenges are coming from growth

near the Chilterns, and what strategy might work here to conserve and enhance its natural beauty.

4. To move towards a Chilterns AONB Transport Strategy there are a number of possible approaches. CCB and CS could jointly prepare and adopt a Transport Strategy document, akin to a Position Statement or Strategy Paper which promotes ideas for others to adopt and implement. Or CCB and CS could convene a meeting of the Highway Authorities to start to explore the merits of and mechanisms for joint work on a Chilterns AONB Transport Strategy, seeking an output with some status like that of Local Transport Plans prepared by Highways Authorities. Another option is getting involved in transport strategy covering a larger geographical area, like England's Economic Heartlands Outline Transport Strategy (see recent CCB response under Item 9).
5. Some final considerations are that CCB currently lacks staff resources and transport expertise for this work. Transport planning can be controversial, and measures are likely to work best with community participation in shaping proposals.

Recommendation

1. **That the Committee notes the update and provides feedback on a way forward.**

Item 8 **Planning Application responses and updates**

Author: Mike Stubbs Planning Advisor

Lead Organisations: Chilterns Conservation Board

Resources: Staff time

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

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

Background

1. News on the outcome of previous planning applications on which the Board has made representations is summarised in Appendix 2.
2. Since the last Planning Committee papers for the July 2019 meeting, the Board has made 23 formal representations on planning applications and 3 appeal representations, including 10 objections, 8 comments and 3 part objection/part comment together with 1 part comment/part support. The formal representations are summarised in Appendix 3.
3. Current live casework is listed in Appendix 4.
4. The Planning Advisor will provide reflections on outcomes of CCB representations.

Recommendations

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

APPENDIX 2**Update on Status of Planning Applications CCB previously commented upon**

Location	LPA	Ref. No.	Proposal	Status	CCB response	Date CCB responded
Land West of Cockernhoe / Land East of Cockernhoe	NHDC	16/02014/1	Erection of 660 dwellings	Pending	CCB Comments as previously reported	05.03.16
Land south and north-west of Cockernhoe and east of Wigmore, Cockernhoe	NHDC	17/00830/1	Mixed use application for up to 1,400 new dwellings and other uses - Outline planning application with all matters reserved	Pending	CCB Objection as previously reported	3.8.17
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	Pending	CCB Qualified Objection as previously reported	24.7.18
Land at Britwell Road Watlington	SODC/ PINS	P17/S3231/O APP/Q3115 /W/19/322 2822	(1) Full planning permission for the demolition of the existing pig farm and its associated buildings; the erection of 183 dwellings (2) Outline permission for up to 650sqm of Use Class B1a floorspace	Pending	Part CCB Comment on LVIA / Part Objection to raised numbers above SODC Capacity Study Appeal heard 15 th -19 Oct 2019). CCB written representations Submitted 6 th August 2018, as previously reported.	27.09.18
OS Parcel 8784 & OS Parcel 0006 Mill Lane Monks Risborough	WDC	17/07666/OUT	Outline application (Including details of access) for the erection of up to 300 dwellings	Refused 13 th Sep 2019	CCB Comments As previously reported 7 reasons for refusal and reason 2 covers the setting of the AONB.	30.10.17

Shirburn Road Watlington	SODC	P18/S0002/O	Outline application for up to 37 Assisted Living Units, and provision of a Care Home (All C2 Use.	Outline pp granted 23rd July 2019	CCB Comments as previously reported. CCB recommended various design amendments to improve the AONB setting relationship.	2.2.18
Century Park Luton	LBC	17/02300/EA	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	Pending	CCB Holding Objection / Part comment as previously reported. Objection based on vehicular routing and cumulative impacts on the AONB, without necessary assurances in the application details.	21.1.18
Abbey View Primary Academy	BCC	CC/0017/18	Development of a new two storey 2FTE (420 place) primary school	Pending	CCB Comments as previously reported.	2.5.18
Land at White Cross Farm, Reading Road, Cholsey, Oxfordshire	OCC	0033/18	Planning Application to allow the development of an offline River Thames marina basin with fixed and floating pontoon moorings for approximately 280 boats.	Pending	CCB Objection as previously reported. [To Note] SODC have now objected to this application.	1.6.18
Abbey Barn Lane- Abbey Barn South Reserve Site Abbey Barn Lane High Wycombe Bucks	WDC	18/05363/FUL	A hybrid planning application seeking outline consent for up to 550 residential dwellings (with a minimum of 520 dwellings)	Pending	CCB Comments as previously reported.	27.3.18
Land to the east of Benson Lane Crowmarsh	SODC	P18/S0827/O	Outline planning application for up to 150	Granted 22 nd May 2019	CCB Comment as previously reported.	12.5.18
Land South West Of Asheridge Road Chesham	CDC	CH/2018/0659/OA	Outline application for the development of site to provide up to 99 dwellings	Refused 18 th Sep 2019	CCB Objection as previously reported. 6 reasons for refusal and reason (2) AONB reasons <i>'The proposal would also introduce a large scale</i>	5.6.18

					<i>development onto a previously undeveloped area of land. This would fundamentally alter the character of the site and this part of the Chilterns Area of Outstanding Natural Beauty. As such, the proposal fails to conserve or enhance special landscape character and distinctiveness of this part of the Chilterns Area of Outstanding Natural Beauty ‘.</i>	
Greendene Farm near Chazey Heath RG4 7UG	SODC	P18/S0650/FUL	65-bedroom elderly care home	Refused 13 th September 2019	CCB Comments as previously reported. Reason (2) Major development in AONB - <i>The proposal would cause material harm to the character and intrinsic quality of this part of the AONB and the harm would outweigh the benefits of the development.</i>	3.10.18
Tralee Farm 20 Wycombe Road Holmer Green Bucks	WDC	18/07194/OUT	Outline application (including details of access, layout & scale) for erection of 103 dwellings with all other matters reserved	Pending	CCB Comment / Part Objection as previously made (based on Local Plan due process).	25.9.18
Kitcheners Field, Castle Hill, Berkhamsted,	DBC	4/01663/18/FUL	Light external drive and parking area	Pending	CCB Objection as previously reported (Amended details submitted).	26.7.18
Upper Little London Farm Little London Wendover Buckinghamshire HP22 6QQ	AVDC	17/00148/AOP (amended landscape assessment documentation submitted June 2018).	Outline application for the demolition of the existing metal barns and outbuildings, conversion of four historic brick barns into one single dwelling, provision of three open fronted parking barns, replacement of existing farm house and erection of 10 new dwellings	Pending	CCB Comments (original CCB Objection 10th April 2017 as previously reported).	24.7.18

Land off Pyrton Lane Watlington	SODC	P16/S2576/ 0	Outline application for the erection of up to 100 residential dwellings including vehicular access, public open space, car parking, landscaping and drainage. (As amended by drawings and additional information received 20 September 2016, 27 October 2016, 24 August 2017 and 13 June 2018).	Pending	CCB Objection as previously reported.	16.7.18
Land Between Longwick Road & Mill Lane Princes Risborough	WDC	18/06916/ OUTEA	Outline application (including details of access only, with all other matters reserved) for the erection of up to 360 dwellings.	Pending	CCB Objection as previously reported.	1.9.18
Land north and east of Glynswood High Wycombe	18/07274 /OUT	WDC	39 dwellings	Pending	CCB Objection as previously reported.	3.10.18
Land at Hithercroft Farm Wallingford	SODC	P18/S2506/ 0	Outline planning application, with all matters reserved (except for access in to the site) for the erection of up to 170 dwellings and 3.1ha of employment floorspace.	Pending	CCB Comments as previously reported.	25.9.18
Land at Abbey View Primary Academy Kennedy Avenue Daws Hill Lane High Wycombe Bucks	BCC	BCC reference: CC/0017/1 8	Amendment to Condition 2 of consent CC/0017/18 relating to location of proposed MUGA on Site.	Pending	CCB Comments as previously reported.	18.1.19

Bozedown Farm Hardwick Road Whitchurch On Thames	SODC	P19/S0113/ FUL	Five Winter Yurts	Pending	CCB Comments as previously reported.	6.2.19
Land adjacent to The Orchard, Benson at Braze Lane Benson	PINS	APP/Q/311 5/W/18/32 19295	Outline application for up to 19 dwellings with all matters reserved.	Appeal dismissed 4 th July 2019	CCB Written Representations as previously reported -On AONB matters the Inspector concluded that (21) <i>'The appeal site will result in a change to the character of the site, however the development of the site when seen in the context of the development to the north would not cause adverse harm to the Clay Vale Character area, or the setting of Chilterns ridge AONB and the North Wessex Downs AONB.'</i> Dismissed on grounds of being isolated and unsustainable development.	1.2.19
Site Of Chiltern Pools, Drake Hall, Community Centre, Amersham Library.	CDC	PL/18/4593 /RC	Demolition of existing buildings known as Chiltern Pools, Drake Hall, Chiltern Youth Centre and Amersham Library	Granted 1 st August 2019	CCB Comments previously reported.	27.12.18
Land adjacent allotment gardens Queensway Hazlemere Bucks	WDC	18/08068/F UL	Change of use of land to cemetery including administration building, maintenance storage area, and car park and landscaping.	Granted 19 th Sep 2019	CCB Objection (based on Local Plan due process and design of current proposal), as previously reported	2.1.19
Litmore Shaw Grays Lane Ibstone Bucks	WDC	19/05120/F UL	Retention of an underground store, retaining wall and open fronted lean to store and installation of a ground source heat system (part retrospective)	Refused 22 nd Oct 2019	CCB Comment / Objection as previously reported. WDC Reason 2 states that <i>' the development is highly visually intrusive in the Chilterns Area of Outstanding Natural Beauty. The forecourt, retaining walls, underground store, planters and lean-to</i>	11.2.19

					<p><i>store are large scale, urban and engineered features. These features do not reflect the strong, rural character of this farmland landscape and they harm the natural, rolling topography of the valley. They have a significantly adverse impact on views from public rights of way primarily to the east and south of the site. Moreover, the large, oval levelled area, created for the ground source heat system, harms the natural folds of the landform and the rolling valley side. It creates a formal, semi-residential feature, which is incongruous in this agricultural landscape. Therefore, the development fails to conserve, or enhance the natural beauty of this designated landscape asset'.</i></p>	
Marchmont Farm Hemel Hempstead	DBC	4/00045/19/MOA	Outline application for up to 350 dwellings and 5 gipsy pitches.	Pending	CCB Comment (AONB settings and cumulative impact issues in Habitats Regulation Assessment), as previously reported.	28.1.19
Land at Holly House Harpsden Bottom Harpsden	SODC & PINS	LPA references P18/S3724/DA and P18/S3725/DA PINS references APP/Q3115 /C/18/3215 490 and APP/Q3115 /C/18/3215 491	Without Planning permission the erection of various buildings and laying of hard standing areas in the approximate locations own edged blue and hatched orange respectively on the "Topographical Survey" annexed (Enforcement Notice Appeal on grounds a, f and g).	Appeal held in abeyance	CCB Written Representations as precisely reported. Planning appeal held in abeyance for further discussion and application P19/S1395/FULsubmitted with car port building withdrawn and ancillary building reduced. Further discussions are being held.	10.1.19

Arla Foods Ltd Aylesbury Dairy, Samian Way, Aston Clinton Bucks	AVDC	19/00399/ APP	Extension to dairy (Final Phase as approved by 11/0962/APP dairy consent - revised scheme)	Pending	CCB Holding Objection , as previously reported. Amended plans and further details submitted.	22.1.19
Bacombe Warren Bacombe Lane Wendover Bucks	AVDC	19/00328/ APP	Demolition of two existing dwellings and outbuildings and construction of two dwellings, an office/workshop, parking and associated landscaping.	Granted 4 th July 2019	CCB Support previously reported.	21.2.19
Down House Ewelme	SODC	P19/S0006/ FUL	Construction of a new poolhouse at Ewelme	Granted 1st August 2019	CCB Comments previously reported.	30.1.19
Land at West Hemel (site allocation LA 3)	DBC	4/03266/1 8/MFA	West Hemel expansion for up to 1100 (outline) and 350 (full)	Pending	CCB Comments as previously reported	15.2.19
M1 junction 11a to A6 Barton Road Sundon Chalton Streatley	CBC	CB/19/008 87/FULL	Construction of a new single and dual carriageway 2.75 miles (4.4km) road linking the M1 and the A6 between the M1 junction 11a and the A6 Barton Road. Comprising intermediate junctions, overbridges, under- bridges, cycle paths, revisions to the Public Rights of Way network, drainage and landscaping	CBC resolved to grant permissio n 11 th Sept 2019. It was referred to MHCLG as a departure applicatio n and the SoS has decided not to call- it in.	CCB Objection and request to Secretary of State to call-in the application as previously reported.	13.5.1 9
22 & 24 Chapel Road & Land To The Rear Of 26 & 16 Chapel	WDC	18/05414/ OUT PINS reference APP/K0425	Planning Appeal against the non- determination of outline application (all matters reserved	Appeal dismissed 15th August 2019	CCB Written Representations.	17.5.19

Road Flackwell Heath Bucks		/W/18/321 8628	accept for access) for the redevelopment of site comprising erection of 950m2 of B1 office space and the erection of up to 22 affordable housing units and associated works including demolition/clearance of existing commercial uses on site.		The Inspector dealt with the earlier appeal and concluded , on AONB matters, that (42).’ Therefore, although I do not have full details relating to that previous appeal scheme, there would appear to be significant differences between it and the appeal before me. Consequently, the findings within that decision relating to the effect on the AONB have limited relevance. In any event, all proposals must be judged on their individual merits, which is the approach I have taken in considering this appeal’.	
Abbey View Primary Academy Kennedy Avenue Daws Hill Lane High Wycombe	BCC	AOC/0027/ 19	Application to discharge condition 11 (lighting) of consent CC/0017/18 for the development of a new two storey primary school, pre-school and associated development – additional details.	Condition s permitted 7 th June 2019	CCB Comments , based around lighting conditions and design / control of lighting.	17.5.19
Amersham School, Stanley Hill, Amersham	BCC	CC/0013/1 9	Proposed demolition of an existing defunct single-storey dining hall in poor condition and its replacement.	Granted 22 nd Aug 2019	CCB Comments , based on the Chilterns Buildings Design Guide as the use of materials and design, the orientation and landscaping and the design of N block exhibits.	2.5.19
Arla Foods Ltd Aylesbury Dairy, Samian Way, Aston Clinton Bucks AVDC reference Amended Plans Consultation June 2019	AVDC	19/00399/ APP	Extension to dairy (Final Phase as approved by 11/0962/APP dairy consent - revised scheme)	Pending	CCB Holding Objection (original application) and comments (additional details). We would seek further information on the following: (1) A measure of clarification on the exact changes to the south east elevation of the proposal, when compared to the existing approval. (2) That weight and attention is given to wider views from within the AONB. The planning	24.6.19

					<p>statement does not deal with the AONB impacts and no landscape assessment is submitted.</p> <p>(3) Clarification as to external lighting and the promotion of minimum lighting and best practice, as applies</p> <p>(4) That the consented Aylesbury Woodlands expansion WDC(16/01040/OUT) is material here, when assessing cumulative change and mitigation.</p>	
Ashwells Field Cock Lane Tylers Green Bucks (amended details - access / revised layout)	WDC	18/05002/R9	Outline application for the erection of up to 102 dwellings. The application includes details of access (site access, estate roads and widening of Cock Lane) and landscaping (public open space and communal areas).	Pending	CCB Comments , as previously reported.	12.4.19
Askepp Nurseries Aylesbury Road Askepp Bucks	WDC	19/06137/FUL	Erection of 1 x 5-bed detached dwelling with study room, 1 pair of 2-x 3-bed semi-detached dwellings with integral car ports & 1 pair of semi-detached dwellings comprising 1 x 4-bed & 1 x 3-bed dwellings (5 in total)	Granted 22 nd August 2019	CCB Comments , as previously reported.	20.6.19
Aston Hill Place Aston Hill Chivery Aston Clinton Bucks.	AVDC	9/00679/A PP	Demolish existing house and erect replacement detached dwelling	Pending	CCB Comments , as previously reported.	21.3.19

Chiltern Hills Academy Chartridge Lane Chesham Bucks	BCC	CC/0012/19	Proposed expansion works at Chiltern Hills Academy.	Withdrawn 6 th Aug 2019	CCB Comments , as previously reported.	17.5.19
Gomm Valley Reserve Site Cock Lane High Wycombe Bucks	WDC reference	19/05281/OUTEA	Outline application (including details of main accesses only) for mixed use development on 57.7ha of land providing for the phased delivery of: residential development of up to 1000 dwellings (Use Class C3)	Pending	CCB Objection , as previously reported.	18.3.19
Langlands Chivery Aston Clinton Bucks	AVDC	19/00842/APP	Demolition of existing single storey dwelling and related outbuildings and the construction of a new two storey detached dwelling house	Pending	CCB Comments , as previously reported.	21.3.19
Long Yard, Dunstable Road, Studham near Dunstable.	CBC	CB/19/00791/FULL	Erection of 32 residential dwellings and demolition of farm buildings at	Withdrawn 6 th Aug 2019	CCB Objection , as previously reported.	31.5.19
London Luton Airport Airport Way Luton LBC reference CCB Holding Objection (lack of information as to environmental impacts) 10th May 2019 Thank you	LBC	19/00428/EA	Application to vary condition 10 of planning permission 15/00950/VARCON for a temporary period (to the end of 2024) to enable the area enclosed by the 57dB(A) daytime noise contour to increase from 19.4 sq km to 23.4 sq km and the area enclosed by the 48dB(A) night time noise contour to increase from 37.2 sq km to 44.1 sq km).	Pending	CCB Holding Objection , as previously reported.	10.5.19
North Barn Chaucer Court Ewelme, Oxfordshire.	SODC & PINS	P18/S2451/FUL PINS reference: APP/Q3115	Erection of a new detached single storey dwelling at	Appeal dismissed 6 th August 2019	Written Representations on behalf of the Chilterns Conservation Board. <i>(9).’ Given the proximity of a number of public and</i>	12.6.19

		/W/19/322 8537			<i>permissive rights of way the site is prominent within the public realm and forms a part of the landscape and CA setting. Whilst it is appreciated that the existing planting mitigates its prominence to some degree, the proposal would remain visible, and for the reasons set out previously it would appear incongruous. Even with additional planting on land within the appellants' control, and which may be secured through conditions, the impact could not be entirely mitigated. Moreover, such mitigation should not be regarded as permanent and landscaping should not be used to hide development that is otherwise unacceptable'.</i>	
Owlpen School Lane Medmenham Bucks	WDC	19/06054/F UL	Demolition of existing dwelling and outbuildings and erection of replacement 3 bed detached dwelling with associated bin store and landscaping works .	Pending	CCB Comment , as previously reported.	20.6.19
The Springs Golf Club, North Stoke, Wallingford,	SODC	P19/S1536/ FUL	The reorganisation of tourism facilities to deliver a Spa and Reception building, a replacement green keeper maintenance and laundry building, extension to the existing clubhouse and provision of 43 hotel lodges	Withdrawn 11 th Sep 2019	CCB Objection , as previously reported.	14.6.19
Woodside Farm Chivery Aston Clinton Bucks	AVDC	19/01107/ APP	Permanent agricultural worker's dwelling	Pending	CCB Comments , as previously reported.	25.4.19

APPENDIX 3**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
The Old Reservoir Greenmore Woodcote	PINS SODC reference	reference: APP/Q3115/ W/19/323074 8 P19/SO259/F UL	Change of use of the land to a park home site and the development of all associated infrastructure to allow the siting of 16 residential park homes with landscaping	Pending	CCB Written Representations Objections raised against a further scheme. The appellant's statement of case does not set out to deal with AONB matters and makes the point that CSEN1 is a landscape policy and not appropriate at this stage. That cannot be correct in light of the previous appeal decision and this policy must carry full weight in any assessment as to impact upon the AONB. CCB would take the view here that the LPA's assessment and the grounds as set out in the first reason for refusal accurately reflects the sensitivity of the location. CCB would ask that appropriate weight is given to these objectives and that great weight is given to the conservation and enhancement of the special qualities of the AONB.	23.7 .19
Cherry Orchards, Cholesbury	CDC	PL/19/0592/F A	Extension and remodelling of the dwelling	Granted 2 nd Sep 2019	CCB Part Comment / Part Objection Accepting its non-designated status but aware that this may be reviewed, CCB would ask that (a) The Historic England Conservation Principles (2008) at 4.2 is applied where it states that ' <i>Conservation is the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations</i> and therefore that (b) the core of the structure as a 17th Century barn is maintained and not demolished. In support of this the traditional plan form of the farm	29.8 .19

					<p>layout must also be conserved. The Chilterns Buildings Design Guide (CBDG) must be given due weight and attention where, in particular, it deals with the relationship between the landform and the built development of the Chilterns. As the Chilterns is a predominantly farmed landscape then the contextual relationship between historic agricultural buildings and their surroundings is a matter of great importance.</p>	
Land off Cuxham Road Watlington	SODC	P19/S1928/O	Outline planning permission for up to 70 dwellings with associated open space and sustainable drainage	Pending	<p>CCB Comments</p> <p>The landscape strategy as proposed, combined with the indicative layouts, avoids developing the north – western limb of the Cuxham Rd site (denoted as allotments) and we support that approach. The Kirkham / Terra Firma report for WAT 9 (now broadly site C) also dealt with the importance of avoiding urban sprawl to the north-west of the town. It is important that the landscaping breaks up the layout, avoids a hard urban edge but also nestles the development with a pattern that fits with the grain of Watlington. Distant views from within the AONB would, in that event, be less impacted by adopting these principles.</p>	14.7.19.
Gooseacre, Buckwood Road, Markyate	DBC	4/01283/19/F UL	New para 79 dwelling	Pending	<p>CCB comments</p> <p>A new house would represent encroachment into the countryside. It is therefore appropriate to consider the site under para 79 of the NPPF as well as para 172 of the NPPF (on planning in protected landscapes). In principle it could be possible to accommodate a new para 79 house on this site, as long as the design is of exceptional quality and great weight is given to conserving and enhancing the landscape and scenic beauty of the AONB. The design is not beautiful. Its form and massing are neither</p>	22.7.19

					traditional Chilterns building, nor an inspiring natural form. The building looks stark, straight edged, urban and not fitting in a rural AONB location. CCB does not consider the design meets the second part of NPPF para 79e in that it would not significantly enhance its immediate setting and it is not sensitive to the defining characteristics of the local area.	
Hawkins Farm Frieth Road Marlow Buckinghamshire SL7 2QU WDC	WDC	19/06552/FUL	Redevelopment of disused farm buildings to create ancillary residential accommodation including conversion of traditional barn, replacement of two farm buildings and demolition of disused agricultural structures	Pending	Part comments / Part objection The fundamental point of planning principle being the loss of a Chilterns farmstead and its inherent layout and vernacular design integrity. The applicants agent's, in the submitted papers, accepts that the site is set within a rising landform (page 23 design and access statement), that building 2 contains brick and flint Chilterns vernacular (3.4 design and access) and that cultural and aesthetic matters apply here (section 3 design and access) albeit they argue an acceptable outcome. CCB do not support the point made that the proposal is sensitively designed to the Chilterns landscape because the fundamental design starting point is not satisfied, i.e. retention of the farmsteads layout and character and then the orientation of development to the existing topography – as in the CBDG 4.17 (as above). The orientation here clashes with that topography.	23.8 .19
Memorial Hall Field, Sonning Common, Reade's Lane, Sonning Common, RG4 9LL	SODC	P19/S2515/FUL	Change of use from agriculture to recreation and sport, with groundworks - contour changes, below ground sports pitch and primary drainage and	Pending	CCB objection Harm to character and topography of undeveloped greenfield land in the AONB from levelling of land to create sports pitches, plus associated fencing, activity and paraphernalia	27.8 .19

			associated landscaping.			
Durham Farm Durham Farm Lane Wendover Buckinghamshire HP22 6PX	AVDC	19/02501/AP P	Relocation of Durham Farm from its existing location to a new location along Durham Lane.	Pending	CCB Objection The Chilterns Conservation Board sympathises with the situation that the existing Durham Farm is planned for demolition to make way for HS2, generating the need for a replacement farm complex. However, looking at this proposal on its merits, the Board's objects to the proposal on the grounds that the plans do not conserve and enhance the natural beauty of the Chilterns AONB. No assessment of alternative locations for the farm complex has been given, there is no landscape evidence to support this application, and proposals raise questions of harm including from removal of mature hedgerow, loss of undeveloped permanent pasture, how animal waste would be stored and treated in a water resource source protection zone, and impact on designated heritage assets and footpath users.	28.8 .19
Land to the east of Manor Road to the south of Little Croft and to west of Elmcroft Manor Road Goring	SODC	P19/S2923/F UL	Erection of 20 dwellings and associated works with all matters reserved except for access.	Pending	CCB Objection The CROW Act 2000 sets a legal test to give special regard to the conservation and enhancement of the natural beauty of the AONB. We accept that the site is now a part of the statutory Development Plan within the Goring Neighbourhood Plan (GNP3), an allocation which CCB opposed at the neighbourhood plan consultation stage. The Development Plan does not have to be followed slavishly, should material considerations indicate otherwise. In this case the protection of the AONB and the	16.1 0.19

					planning history (refusal on appeal) constitute such material matters. CCB would also make the point that in a recent decision in the High Court (in Monkhill v SSHCLG) that the fact that development is contrary to AONB objectives is sufficient reason of itself to justify refusal.	
Chalfont St Peter	CDC	PL/19/2726/F A	Temporary haul road for the Chalfont St Peter HS2 vent shaft	Pending	<p>CCB Objection</p> <p>The site is in the setting of the Chilterns AONB. In its favour the haul road would save lorries from going past Epilepsy School and avoid widening of Chesham Lane. However, this site is problematic:</p> <ul style="list-style-type: none"> - lorries will have to pass through a residential area. - the haul road cuts straight up the valley side. - the road will be visible from the South Bucks Way and across the valley. - There will be a significant risk of run off in heavy rain events. It appears from the Drainage Plan that water would drain into the River Misbourne which is likely to have impacts on this chalk stream, a rare and fragile habitat. 	17.1 0.19
Highlands Farm, Highlands Lane near Rotherfield Greys RG9 4PR	SODC	P19/S2646/F UL	Variation of housing mix at Highlands Farm, comprising the substitution of 85 dwellings in the central and south-western parts of the site with 113 dwellings; a net increase of 28 dwellings	Pending	<p>CCB Objection</p> <p>The impact on the AONB would be greater than the consented scheme in terms of design (especially materials and higher building heights) and the larger number of homes means more car parking and journeys through the AONB</p>	24.1 0.19
Land west of Fairmile Henley-on-	SODC	P19/S2350/F UL	Demolition of existing buildings and development of	Pending	<p>CCB Comments</p> <p>CCB recommends that, (i) An LVIA assessment is completed, (ii)</p>	9.9. 19

<p>Thames RG9 2JU</p>			<p>72 residential units comprising 52 houses and 20 flats with associated access, servicing, parking, amenity space and landscaping.</p>		<p>Maintaining elements of the unimproved grassland that sits within the site, associated with (below), (iii) Adherence to achieving biodiversity net gain, as is stipulated in Neighbourhood Plan Policy EN1.(iv) Reviewing the design on the western boundary on the basis of the LVIA findings. Any assessment here will need to consider the Chilterns Buildings Design Guide but must assess the impact of the large scale of development proposed. For instance, we would want to know just how visible these plots will be. Basement excavation is unusual in cases of AONB setting. The CGI file view 3 illustrates a much larger form of development than found elsewhere. Certainly the scale and rearward projections proposed on the western boundary blocks do not accord with the AONB/urban fringe boundary that runs to the upper and lower parcels of this western boundary. (v) Paying closer regard to the impact of building out across Area 2 (as defined in the Landscape Design Brief). A reduction in the number of dwellings to the level set out in the Neighbourhood Plan would improve this relationship when viewed from wider AONB views (from the Oxfordshire Way, in particular).</p>	
<p>London Luton Airport Airport Way Luton</p>	<p>LBC</p>	<p>19/00428/EIA (additional details consultation July 2019)</p>	<p>Application to vary condition 10 of planning permission 15/00950/VARC ON for a temporary period (to the end of 2024) to enable the area enclosed by the 57dB(A) daytime noise contour to</p>	<p>Pending</p>	<p>CCB Objections The Chilterns Conservation Board (CCB) CCB previously raised a holding objection in response to the original May 2019 consultation. We have now seen the additional commentary in the updated Environmental Statement (ES) and revised Planning Statement. CCB still has a number of concerns about this application and we have noted the objection raised by Dacorum BC of 12th July 2019 and other local</p>	<p>22.8 .19</p>

			<p>increase from 19.4 sq km to 23.4 sq km and the area enclosed by the 48dB(A) night time noise contour to increase from 37.2 sq km to 44.1 sq km).</p>	<p>planning authorities. Dacorum BC, in particular, deal with the impacts at Markyate and Flamstead. Both of these are parishes fall within the AONB boundary. They are both the subject of compensation in the proposed variation to the section 106 agreement and both are mentioned in the planning statement with respect of mitigation</p> <p>(1) The updated ES (of July 2019) makes the point in the technical chapters (6.71) that the Chilterns AONB is unlikely to be the subject of any adverse effects <i>‘regardless of the contours being sited closer to the boundary of the AONB’</i>. This judgment is based on the assumption that the aircraft are above the 4000 ft threshold as established in the Air Navigation Guidance 2017, which provides advice that such affects are deemed insignificant. The ES appendix 7C includes two Chilterns villages (Markyate and Flamstead) within the 2011 baseline comparison to 2019 levels. In these locations the daytime and night time contours, respectively, would increase from 51 dB to 53 dB and 46 dB to 48 dB. We are aware that a 3 dB increase is equivalent to a doubling of the sound energy involved and is, therefore, a significant increase (see IEMA Guidance 2014 para 2.17). This would render both measurements above the <i>‘lowest observed adverse effect level’</i> threshold (LOAEL) and thus, we have reasonably assumed, an environmental threshold has been crossed. Residents and visitors alike have benefitted, in past years and from at least 1998 to 2014, to noise conditions within the approved conditions that govern the airport operator’s planning consent. Their enjoyment over this long duration has been now been altered. CCB</p>
--	--	--	---	---

					would ask that weight is given to the LOAEL metric as a measure of impact within the AONB. Pont (2) below further links to this.	
Land To The North Of Heath End Road Little Kingshill Buckinghamshire	CDC	Ref CH/2017/029 O/FA	Temporary rural workers dwelling, erection of general purpose agricultural building and yard, formation of farm track	Pending	<p>CCB Objection</p> <p>CCB supports the previous reason for refusal as put before the planning committee meeting of 18th April 2019, where it deals with AONB impacts. The LPA’s own consultant (Bourne Rural Assessment at 5.1) notes that the proposed siting of the temporary dwelling and the agricultural building create two separate areas of development, which is unjustified in agricultural terms. This also has implications for the landscape as development is spread and the new track further harm the landscape. The significant length of the agricultural track is also noted by the agricultural consultant. The agricultural cabin (accommodation) is deemed larger than is reasonably required. In conclusion CCB makes the point here that much greater weight (<i>‘great weight’</i> as in the NPPF) must be given to the conservation and enhancement of the special qualities of the AONB when compared to other material considerations, including the financial and functional points advanced.</p>	16.1 0.19
OS Parcel 1318 Upper Icknield Way Saunderton Buckinghamshire	WDC	19/07349/PN P16A	Prior Notification for the installation of 10.00m TP325 replica telegraph pole on new D6 foundation and associated works	Pending	<p>CCB Objection</p> <p>The location is sensitive and highly valued within the Landscape Character Type 17 ‘Dipslope with Dry Valley’. The track would harm the landscape and its use would clash with walkers of the footpath and diminish their enjoyment of the AONB. This harm is unnecessary and can be avoided through reconsideration of the location and vehicular access requirements.</p>	29.1 0.19

Pirton Water Tower Priors Hill Hertfordshire	PINS	APP/X1925/W/19/3227185	Demolition of redundant water tower and erection of one x 3 bed dwelling at	Pending	<p>Written Representations on behalf of the Chilterns Conservation Board</p> <p>The appeal site is located in close proximity of a sensitive boundary between the AONB and the nearby urban edge. One dwelling in the stead of the tower would replace what is currently a utilitarian structure with what is an urban erosion of the landscape. The core duty to conserve and enhance the special qualities of this nationally protected landscape would be diminished. CCB accepts the benefit of removing the structure but the resulting harm outweighs this benefit.</p>	7.8.19
Outline application for up to 37 Retirement Units for people aged 55 and over, provision of a Care Home and 4 staff accommodation units (all matters reserved for future consideration with the exception of access)	SODC	P19/S2380/RM	Reserved Matters application following Outline approval P18/S0002/O for 37 retirement houses, care home and 4 units of staff accommodation	Pending	<p>CCB Comments</p> <p>(i) On design matters the elevation and plan details break-up the layout and provide articulation to the design. As a consequence the roof layout is articulated and the applicant proposes a variety of materials. The mix of materials appears appropriate and combines predominantly tiles and some slate. The contextual drawings, as submitted, are helpful and reinforce the point that a softer visual appearance is very much in the eye of the architect here, with careful use of hipped roof features and tile hanging details and the careful avoidance of white painted joinery. The use of clays/natural slate will chime with these design details.</p> <p>(ii) On landscape matters we have noted that the landscape layout plan confines the proposed planting to within the application land as edged red. The land edged blue, on the accompanying site plan, is not a part of the scheme. CCB would just seek to be reassured that the new road and roundabout, as denoted on the plans and outside this application (if in part within the applicant's</p>	27.8.19

					ownership) will be the subject of some landscaping at a later stage? We report this because the roundabout is a potentially strong urban feature next to the AONB boundary and we would seek to soften its appearance, as is appropriate.	
At Stony Dean School Orchard End Avenue Amersham Buckinghamshire HP7 9JW	BCC	BCC reference CC/0046/19	Proposed new single storey self-contained 6th Form block comprising four classrooms, common room, office, intervention room, toilets and storage. External areas comprising fenced in teaching area connected to new building, patio and planting beds.	Pending	<p>CCB Comments</p> <p>CCB would draw attention to the Chilterns Buildings Design Guide as the use of materials and design features will be an important consideration in the application of the decision-making duties as set out previously.</p> <p>The proposed Kingspan roofing material would not ordinarily accord with such design details. In our judgment it sits within the backdrop of the urban area. However we would recommend that carefully attention is given to its colour palette to ensure a muted visual appearance when viewed from the footpath network.</p> <p>Strict controls must be exercised over lighting, should this be proposed. No lighting plan is submitted but will need to be the subject of a condition in which minimum light spill must be demonstrated and lighting differentiated between security and operational lighting, so that the latter may be the subject of timing controls to minimise impact. Lighting is an issue of great importance within and affecting an AONB and has potential to exact a significant impact on the PROW network.</p>	17.9 .19
The Misbourne School	BCC	CC/0043/19	Proposed demolition of the existing	Pending	<p>CCB Comments</p> <p>The appeal site is located within the AONB and therefore must pay</p>	14.1 0.19

<p>Misbourne Drive Great Missenden Buckinghamshire HP16 0BN</p>			<p>outdated Sports Hall and construction of a playing area in its place; construction of a new two-storey Sports Hall adjacent to the south of the new playing area; construction of a new five classroom single storey Teaching Block; extension to Multi-Use Games Area; and new Coach Access and Car and Coach Park and drop-off zone</p>		<p>special regard to the conservation and enhancement of the landscape character. The new AONB Management Plan 2019-2014 is a relevant consideration and CCB invites BCC to give this weight. The route of the South Bucks Way, Lighting and to some extent arboricultural matters are unresolved and greater detail is needed.</p> <p>On the point of lighting CCB promotes best practice to minimise and contain impact. New technologies promote this and we seek a rigorous approach to prevent light spill to the south from encroaching upon the landscape and resulting in an urbanising effect.</p>	
<p>At Wallace Hill Farm Wellground Stokenchurch Buckinghamshire HP14 3YF</p>	<p>WDC</p>	<p>19/07065/FUL</p>	<p>Demolition of existing agricultural building and silos and the erection of a three storey (plus attic) practice centre building (Use Class D2) incorporating Wallace Hill Cottage, the conversion of Wallace Hill Farmhouse for ancillary office use, replacement of the agricultural store (Bee House) with a</p>	<p>Pending</p>	<p>CCB Comment / Support</p> <p>In conclusion CCB expresses support for the economic and well-being benefits that follow, consistent with our secondary purpose. The principal of development is established, consistent with the NPPF 172 and delivery of the conservation and enhancement duties consistent with the Development Plan and AONB Management Plan.</p> <p>We promote some small revisions and controls within planning conditions to review or conceal the service road, to ensure that the car parking screening is outside the chalk grassland priority habitat and that the transport plan covers guests/visitors, in part justified by air quality / ecological matters.</p>	<p>2.10 .19</p>

			two-storey workshop.			
Land Between Junctions 16 and 17 Of The M25 Near Chalfont St Peter Buckinghamshire	CDC	PL/19/2260/OA	Outline Application for the erection of a Motorway Service Area with all matters reserved with the exception of access from the M25, comprising a facilities building, fuel filling station, electric vehicle charging, up to 100 bedroom hotel, service yard, parking facilities, vehicle circulation, landscaping, woodland and amenity spaces, Sustainable Drainage Systems (SuDS)/attenuation, pedestrian and cycle links, retaining structures and associated mitigation, infrastructure and earthworks/enabling works.	Pending	CCB Comments CCB Conclusions -CCBs accepts the point that immediate inter-visibility between the AONB and the development is partially contained by topography, planting and separation. Landscape character is affected however and the planning authority will want to consider the setting of the AONB and the general creep of development around and from the motorway into this open and predominantly rural location. Whilst CCB has not raised objection we do feel that there is a policy linkage here between the Green Belt and the AONB, i.e. the Green Belt status helps maintain an open character to the south of the AONB boundary and limits the potential for a significant erosion of the rural area as a consequence of motorway related development. We consider this a material matter in the determination of the application because whilst a direct visual impact is not sufficient to justify objection, the agglomerated noise, lighting and development impact here will inevitably change the landscape character. In effect, if the LPA were minded to accept the very special circumstances case as advanced by the applicants, then we submit that landscape improvements cannot be included 'very special circumstances' as the wider landscape character and its hinterland are changed and dramatically so.	29.8 .19
Weyburns Wood Longdown Hill Cadsden	WDC	WDC Ref 19/06683/FUL	Erection of building for tractor storage and two containers as workshops for	Pending	CCB Holding Objection CCB raises a holding objection to this application as this site is both ecologically sensitive and protected as both ancient woodland and a	22.1 0.19

Buckinghamshire			use in Forestry Work (Retrospective) at		<p>woodland priority habitat (also see DEFRA’s Magic website). The planning application form at its section 12 Biodiversity and Geological Conservation is incorrectly completed at (a) Protected and priority species and (b) Designated sites, important habitats or other biodiversity features.</p> <p>These errors will need to be corrected and internal / external consultations reconsidered notably the LPA’s in-house ecologist and Natural England. We also have concerns regarding the nature of this operation within such priority habitats. The application lacks necessary controls and assurances here and the applicant appears unaware of the nature conservation status that surrounds.</p>	
Land at Woodcote Road South Stoke	SODC	P19/S2865/	Application for approval of reserved matters relating to appearance, landscaping, layout and scale following application P17/S3206/O for residential development (up to 5 dwellings), and associated works, including access.	Pending	<p>CCB Comments</p> <p>The application is comprehensive and sets out an appropriate landscape and visual impact assessment (LVIA). We support the point made (at its 4.2) that the AONB requires a sensitive response. We also support the LVIA’s recommendation that the tree belt is reinforced here (4.4). Further the supporting planning statement (at 8) that vernacular materials, such as clay tile and red brick, are appropriate in this location. We support that point and recommend the use of Chilterns suppliers. This will appropriately compliment the grey composite finish of the proposed elevations.</p> <p>The application reserved matters respond to the AONB context and landscape character. The use of high quality materials and the reinforcement of the existing native</p>	14.1 0.19

					<p>tree screen will serve to reinforce that character.</p> <p>The Planning Statement rather jumbles the application of NPPF 192 in that it suggests that 192 need not apply if the application is not deemed major development. That is not correct and NPPF 192 still applies. We suspect the applicant accepts this point and the issue is really one of clarity.</p>	
66 Hambleden Village Hambleden Bucks	WDC	19/07105/FUL &106/FUL	Householder application for construction of two storey rear extension and associated internal alterations following the demolition of the existing single storey lean-to and garden shed	Pending	<p>CCB No Comments</p> <p>To assist the determination of this application, we set out below the legislative and policy tests that apply within the nationally protected landscape of the Chilterns AONB. We do refer to the Chilterns Buildings Design Guide (CBDG) below, as a material matter. The CBDG lacks the detail necessary to determine this application, in that the assessment here requires considerations of architectural detail and the CBDG deals with matters of broader principle.</p>	10.1 0.19
At Berry Hill Farm Cobblers Hill Wendover Buckinghamshire HP22 6QD	AVDC	19/02319/AP P	Laying of Hardcore surface (Retrospective)	Pending	<p>CCB Comment / part Holding Objection</p> <p>The need and rationale behind the hard surfacing does require justification as the policy tests, as set out above, set a series of very high tests to conserve and enhance the special qualities of the AONB.</p> <p>CCB therefore recommends that the applicant clarifies the purposes of this application. It may be the case that a Certificate of Lawfulness is required here but we have focused on the planning merits of the application as before the Local Planning Authority.</p>	12.8 .19

<p>Planning Appeal by Mr C Kelly against the decision of Wycombe District Council to refuse planning permission on land to the North Side of Cholsey Grange Ibstone bin stores, car parking and creation of new access</p>	<p>PINS</p>	<p>APP/K0425/W/19/322665 8</p>	<p>The erection of a terrace of two storey three 3-bed dwellings with one attached single garage and one two storey 3-bed detached dwelling with integral garage (4 in total), associated landscaping,</p>	<p>Appeal allowed 8th Oct 2019</p>	<p>Written Representations on behalf of the Chilterns Conservation Board</p> <p>As the current appeal stands no appropriate and proportionate landscape assessment is submitted. CCB therefore raised objection at application stage that the development proposed would not serve to conserve or enhance the special qualities of the AONB by coalescing the surrounding development to the detriment of its rural character. CCB would also respectfully ask that the Inspector considers the point as raised by the Local Planning Authority (5.12 of officer’s report, as above) that an undesirable precedent could be set and gives weight to the Bucks LCA 16.1. In light of the pressures faced by the AONB for small scale schemes with a combined cumulative impact, CCB supports the LPA’s objection as raised in reason one of the notice of refusal, dated 3rd January 2019. When the Inspector visits the site and walks the landscape we would be grateful if weight and attention is given to the Landscape guidelines for LCA 16.1 (as mentioned earlier) and where it states the objective to <i>‘Conserve common land and common edge settlement, and ensure proper management of these spaces. Conserve the loose settlement character preventing infilling and nucleation’</i>.</p> <p>[Note] This appeal was allowed and the AONB objection not upheld. The Inspector gave weight to visibility and not landscape character in concluding that the development would conserve the character.</p>	<p>23.7 .19</p>
--	-------------	--------------------------------	--	---	--	-----------------

APPENDIX 4**Current Live CCB Planning Application Casework**

Location	LPA	Ref number	Development	Deadline
Britwell Road Watlington	PINS	APP/Q3115/W/19/3 236576	185 Dwellings (second appeal)	5 th November 2019

APPENDIX 5

CCB Responses on Development Plan Consultations:

Consultation document	Consult ed by	Response – summary	CCB response date
Princes Risborough expansion SPD	WDC	<p>This draft SPD is premature to the Inspector’s report on the Wycombe Local Plan. CCB would welcome ongoing engagement with the Council on the Princes Risborough expansion because of the sensitive location of the proposal within and in the setting of the Chilterns Area of Outstanding Natural Beauty (AONB).</p> <p>Page 10 lists the relevant policies in the Local Plan, this should be expanded to include Policy DM30 on the Chilterns AONB. This is because since significant elements of the transport infrastructure (Culverton Link, Shootacre Lane, Grove Lane-A4010 and Mill LaneA4010 junctions) are within the Chilterns AONB, and the expansion area is within the setting of the Chilterns AONB (see photo view from Whiteleaf overleaf). Very careful consideration needs to be exercised for any 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>Section 2: Analysis The analysis of the expansion area has some significant gaps which must be addressed relating to the setting of the Chilterns AONB, priority habitats, water quality in escarpment headwaters, the Ridgeway National Trail and ancient field systems. Most of the maps ignore the southern part of the expansion area at Princes Risborough (land off Poppy Road, Shootacre Lane and the Culverton Link) as well as the off-site transport improvements areas in the AONB at Grove Lane and Mill Lane junctions. The analysis is partial and not addressing key areas of impact in the Chilterns AONB. To address this we offered a number of detailed recommendations on chalk headwaters, priority habitat, light pollution, Ridgeway National Trail etc.</p> <p>Section 3: Development requirements The Chilterns Conservation Board’s major concerns are that the housing number designed for at Princes Risborough is too large, that the relief road proposals involve a new Culverton Link road and works to rural lanes and junctions in the AONB, that a significant area of greenfield land is under pressure for development in the setting of the Chilterns AONB and that the impacts on the Chilterns AONB, and on chalk streams, have not been accorded the appropriate weight. The proposals do not “respond sensitively to the environmental qualities of the surrounding area” as required by the vision in draft Local Plan policy PR6, because they involve proposals which would bring material harm and major development to the Chilterns AONB at Culverton Link and to the setting of the AONB. The analysis section fails to understand view towards the</p>	19.7.19

	<p>AONB, for instance looking south east from Alscot towards Whiteleaf. Key views from Brush Hill and the Ridgeway National Trails are also absent in the analysis. This has meant that the urban design response fails in several important areas:</p> <p>Sports Hub The Sports Hub would be visible from Whiteleaf and involve sports fields and facilities including changing rooms, sports hub, MUGA, 3G multi pitch and car parking and floodlighting. This would be intrusive in daytime views and bring unacceptable light pollution at night. The area is clearly visible from Whiteleaf.</p> <p>There should be no development east of Mill Lane, where a roundabout and sports hub are proposed. This land is very visible from the AONB at Whiteleaf. 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. The roundabout would trigger a ring of tall column lighting picking out the road corridor in a previously dark area. Section 3.4 and Figure 15. Building heights are excessive and should be restricted to 2 storeys maximum throughout the expansion area.</p> <p>Section 3.6.2 Longwick Gap. This should be significantly wider. There should be no development to the north of the Crowbrook Stream, this land is very visible from the AONB, its sloping aspect makes it highly prominent. The Lower Icknield Way green buffer to Longwick as proposed is not wide enough to protect the visual impact from Whiteleaf, it would be imperceptible as a gap and ineffective.</p> <p>3.8.1 Walking and Cycling refers to wider connection to key locations in the Chilterns AONB such as Brush Hill and Whiteleaf Hill, and connection to the Ridgeway National Trail. Unlike the Phoenix Trail connection, no details or suggestions are made. Without proposals there is a danger nothing will be delivered. We suggest a meeting with the Chilterns Conservation Board's people and society officer Annette Venters to work up some firm proposals to include in the SPD. Enhancements to visitor facilities, rights of way and habitat management at Whiteleaf and Brush Hill will be necessary to mitigate the harm from an increased town population at these already popular sites. The Chiltern Way and Chilterns Cycleway are also on the doorstep of Princes Risborough.</p> <p>Movement and Access The Chilterns Conservation Board objects to the proposed highway alterations which fail to conserve and enhance the Chilterns AONB. By land take within the AONB, light pollution, noise pollution and impact on tranquillity and enjoyment of users of Public Rights of Way (including the Ridgeway National Trail and National Cycle Route), the transport upgrade schemes fails to identify, assess or protect in line with statutory duty towards the AONB.</p> <p>The scale of development 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 additional traffic on the A4010 would pass close to the internationally</p>	
--	--	--

	<p>designated biodiversity sites of the Chilterns Beechwoods Special Area of Conservation at Bradenham and Great Kimble. All SACs in the Chilterns AONB have already breached the critical loads for air pollution. Natural England’s Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018 http://publications.naturalengland.org.uk/publication/4808896162037760 explains (page 12) that: "The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it." There is further information about the problem in Plantlife’s report We need to talk about Nitrogen. The proposals in the Princes Risborough SPD fail to protect the SAC from an increase in vehicles on routes close to the SACs.</p> <p>The Environmental Guidelines for the Management of Highways in the Chilterns produced by the Chilterns Conservation Board in conjunction with the County councils including Bucks County Council, identifies how transport projects can often harm that special rural character of roads and the naturalness of lanes in the AONB. It gives advice on works that should be avoided, such as narrowing of verges, installation of kerbs, road drains, fencing, erection of street lights, signage, and road markings. Junction improvements involving roundabouts are normally associated with urban areas or major roads, and trigger requirements like lighting, mandatory signs and lines. There is no evidence that this guidance has been understood or followed in the draft SPD which breached its advice at every location in the AONB.</p> <p>CCB objects to the proposed Culverton Link road in the AONB, which would constitute major development in the AONB to which the NPPF para 172 tests would apply, with a presumption for refusal.</p> <p>The Chilterns Conservation Board also objects to widening or intensification of Shootacre Lane and Picts Lane, and any insensitive junction improvements at the junction of Shootacre Lane with the A4010, or the junction of Shootacre Lane with Picts Lane. Shootacre Lane is within the Chilterns AONB. It has a rural character, with soft edge verges, no street lighting, hardly any road markings and open sweeping agricultural land on one side. It would be inappropriate to divert volumes of through-traffic down this lane in the AONB. It could also lead to rat running through other rural villages such as Saunderton and Bledlow. Shootacre Lane is well used by recreational users, with currently low traffic volumes. Shootacre Lane is crossed by the Ridgeway National Trail which runs along the Upper Icknield Way. The Ridgeway National Trail should be given significant weight in any decision but appears to be given none. The plans will not protect and enhance users of public rights of way including the national trail (NPPF para 98). It has wide grass verges and no street lighting. Picts Lane has also got a rural and in parts historic character. The junction with Picts Lane is rural with a historic finger post road sign in the centre of a grassed island. Picts Lane is a national cycle route (NCR 57). This AONB lane is not available, suitable or desirable for major upgrades to accommodate A-road traffic.</p>	
--	---	--

	<p>The idea to use Shootacre Lane to form a temporary (or perhaps permanent) stretch of the Princes Risborough relief road has not been tested at the Local Plan examination. In the draft Local Plan the Culverton Link road (also not acceptable in the AONB) was proposed as the route. The SPD is proposing an untested alternative. The Chilterns AONB is facing the worst of all worlds: both the Shootacre Lane “improvements” at the start and then later the harm from the Culverton Link. Both the improved road and the new road would result in lasting harm to the special qualities of the AONB, and would have a compounding and cumulative effect on the quality of this area of the Risborough Chalk Foothills landscape character area (LCA 10.6 in Wycombe District Landscape Character Assessment, Land Use Consultants).</p> <p>The proposal to upgrade the Shootacre Lane/ A41010 junction if the Culverton Link is not built makes no reference to AONB constraints. This junction is entirely within the AONB and is visible and significant. Any change here would require careful design to avoid an urbanised junction, with tall column lighting, signage clutter, and should follow the advice in the Environmental Guidelines referred to above. It would require EIA and testing of impacts and alternatives and identification of required mitigation to landscape, habitats and visitor enjoyment. A new mini-roundabout in Monks Risborough at the junction with Mill Lane would be partly within the Chilterns AONB (the road is the AONB boundary) and in the setting of the AONB. A mini-roundabout would harm the rural and historic character which is still present here with the mature trees, memorial and attractive brick and flint cottages and primary school. It is likely to trigger a ring of street lighting columns and harm views and dark skies. Removal of trees which currently provide screening would compound this harm.</p> <p>The proposed new junction in Little Kimble (at the Grove Lane/ A4010 junction) is partly in the Chilterns AONB (the A4010 is the AONB boundary) and requires regard to conserving and enhancing natural beauty of the AONB. The proposal fails to be a non-urban low-key design. It involves felling of mature trees important for screening views from elevated land in the AONB. There are no details on the design of the bridge, whether this is under or over the railway. The works are likely to involve additional column lighting, signage, clutter and a greater extent of tarmac. No information is given on reduction or mitigation of impacts. An EIA will be required. The report raises the prospect of a T junction, roundabout or signalised junction, consideration of alternatives must be undertaken which give great weight to conserving and enhancing the natural beauty of the Chilterns AONB which thus far appear absent. The Jacobs Report concludes that “A preferred design for the Grove Lane junction with the A4010 needs to be identified and agreed by Wycombe and Buckinghamshire councils.” We object to this lack of reference to the Chilterns Conservation Board, public participation or EIA before a design is “identified and agreed”.</p> <p>Section 4 Design details Chilterns Conservation Board requests a meeting to discuss Design Details in more depth. The analysis of landscape sensitivities of the character areas and the design response is simplistic and does not properly address harm to the setting of the AONB. To date the</p>	
--	--	--

	<p>Chilterns Conservation Board has not been invited to discuss the design of the development or the roads in the AONB.</p> <p>The advice in the Chilterns Conservation Board’s Position Statement on Development Affecting the Setting of the Chilterns AONB available online at https://www.chilternsaonb.org/conservation-board/planning-development/positionstatements.html is neither referred to nor properly applied. It provides useful advice and guidance on avoiding and reducing harm which should be utilised in the SPD. The nature of the impacts and the harm they exert on the AONB will depend on key variables such as:</p> <ul style="list-style-type: none"> • the extent of the built area – particularly the depth northwards towards Longwick and the amount of expansion eastwards towards Askett • the amount and location of the green infrastructure and accessible green space • the development layout and density • the massing, materials and building heights • the formality of the design and the roofscapes • the street lighting design • the application of AONB mitigation measures. <p>Views from Brush Hill nature reserve and the Ridgeway National Trail have been overlooked. Whiteleaf is not the only important viewpoint providing panoramic views. Buildings heights and densities should be reduced. Lessons should be learnt from the 3 storey Churchill retirement flats called Chiltern Lodge recently built near the Tesco roundabout which are visibly too high and too bulky when seen from Whiteleaf. Tall development also blocks views to the AONB. It is important to retain Princes Risborough as a market town nestling under the dramatic chalk escarpment, that relationship between town and hill has meaning and gives a sense of place.</p> <p>Materials and design should refer to the Chilterns vernacular, see Chilterns Buildings Design Guide.</p> <p>The local centre should not be located north of the Crowbrook Stream, this land is visible and prominent from the Chilterns AONB. Unsuitable for 3 to 4 residential storeys, a square, highly glazed elevations and flat or single pitched roofs. Flat pale bulky roofs should be avoided in locations visible in elevated views in the setting of the AONB, and large areas of windows spill light and harm dark night skies.</p> <p>Building heights should be reduced to 2 storey throughout. Flat roofs and contemporary designed apartment blocks should be avoided because of visual bulk and prominence in views. It is clear to see effect of existing pale flat roofscapes on employment uses in this view – see gigapan photo overleaf and at http://www.gigapan.com/gigapans/182501. Green roofs (grass not sedum which turn yellow/red in dry weather) are a potential exception to this.</p> <p>The SUDS measures in the Drainage Strategy for the main PREA e.g. pervious pavements and porous asphalt in the high-density development, would release polluted surface water run-off into the chalk aquifer through infiltration. The water quality of the Mill Brook,</p>	
--	---	--

		<p>Crow Brook, Kingsley Cuttle Brook and Pyrtle Brook are at risk from the proposed development and relief road.</p> <p>Section 5 Delivery plan The Chilterns AONB is facing the worst of all worlds: both the Shootacre Lane “improvements” at the start and then harm from the Culverton Link road, which would be major development in the AONB to which the tests in NPPF para 172 must be applied, with a presumption for refusal. This was not in evidence before the Local Plan examination, when they were presented as alternatives: Shootacre Lane or Culverton Link, not both. There is a cumulative negative impact on the Chilterns AONB.</p>	
<p>Chiltern and South Bucks Publication Local Plan</p>	<p>C&SB</p>	<p>Do you consider the Local Plan to be legally compliant? No. The Chilterns Conservation Board is concerned that in preparing the plan the Councils have not shown regard to the purpose of conserving and enhancing the natural beauty of the AONB, which is a legal requirement under section 85 of the Countryside of Rights of Way Act 2000. This is because there are allocations in the Chilterns AONB which constitute major development (Policies BP4 and BP5), and the plan and sustainability appraisal are silent or erroneous on basic points like on whether sites are within the AONB, whether development would constitute major development in the AONB (para 172 of the NPPF), what the AONB impacts would be, and whether they could be mitigated.</p> <p>The plan also proposes a substantial weakening of controls on windfall development at many villages within the AONB (Policy DMPP1) which allow infilling within characterful villages in the AONB and Green Belt including Chenies, Little Missenden, Hawridge, Penn, Penn Street, Cholesbury. This is likely over time to alter the special qualities of the AONB through residential intensification and pressure for ever larger and less affordable housing. It shows a lack of regard under the CRoW Act section 85. The housing requirement set in the plan and spatial option chosen has not shown regard to conserving and enhancing the AONB. Last year the Government added a new sentence to the NPPF section on AONBs and National Parks: “The scale and extent of development within these designated areas should be limited” (NPPF para 172). In July 2019 this was augmented with a whole new section in the Planning Practice Guidance on objectively assessed needs in protected landscapes.</p> <p>The quantum of development in the AONB should be reduced. This would be in line with the approach in another AONB: Arnside and Silverside AONB. They have the first AONB-wide DPD in the UK. It has been successfully through examination and adoption. It is for Arnside and Silverdale AONB which covers parts of Cumbria and Lancashire. It is AONB only, not AONB and Green Belt as in Chiltern and South Bucks. The Arnside and Silverdale AONB plan takes a landscape capacity approach to housing development. It makes a small number of allocations for between 6 and 12 dwellings. The largest allocation is 12 dwellings, they have not attempted to meet a housing figure or accommodate x thousand new homes.</p>	<p>22.8.19</p>

	<p>The Chiltern and South Bucks local plan is weak on biodiversity in terms of both draft policy and allocations. It lacks an evidence base on ecology, with sites proposed for allocation despite no desk based or field ecological assessments having taken place. This fails to meet the Councils' legal duty to have regard to conserving biodiversity as part of policy or decision making, under Section 40 of the Natural Environment and Rural Communities Act 2006. It fails to meet the advice in the Planning Practice Guidance that "Planning authorities need to consider the potential impacts of development on protected and priority species, and the scope to avoid or mitigate any impacts when considering site allocations or planning applications." (Para 016 Reference ID: 8-01620190721). The Chilterns Conservation Board is concerned that once allocated in an adopted plan, it will be too late to protect ecological value identified in ecological surveys on sites at the planning application stage. The expectation of developers will have been raised and site will be relied upon in the housing land supply.</p> <p>The plan proposals threaten rare chalk streams. 85% of the world's chalk streams are in Southern England, and the Chilterns AONB contains the largest cluster. None of 9 Chilterns chalk streams is currently meeting Water Framework Directive standards in Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy, mainly because of over abstraction for public water supply. Chalk streams are an internationally rare and fragile habitat and a precious resource. Two chalk streams are within Chiltern and South Bucks: the Rivers Chess and Misbourne. The River Chess is perhaps the most picturesque and well visited of all our chalk stream, with the popular River Chess walk.</p> <p>Suggested modification: The allocations BP4 and BP5 within the AONB should be deleted. Policy DM PP1 should not apply to any villages within the nationally protected landscape of the Chilterns AONB. Development levels should be reduced to within the environmental capacity of the area, in particular sustainable water supply, in order to protect the chalk aquifer and chalk streams.</p> <p>Do you believe this plan meets the tests of Soundness? No. Chilterns Conservation Board has concerns about the merits of going ahead with the submission and examination of this plan when the new unitary authority will be formed in April 2020. The release of Green Belt and AONB land in southern Buckinghamshire cannot be justified with this change on the way. There is no reason to rush into a plan which makes harmful allocations, since AONB and GB land are protected from the presumption in favour for speculative applications under NPPF para 11, and this covers most of both districts. This was demonstrated in a recent High Court decision relating to a (non -major) housing development in the Surrey Hills AONB. It confirms three things: • great weight to AONB qualifies as a policy to be applied under NPPF para 11d(i) • that para 172 can be used as a freestanding reason for refusal in non-major as well as major development in an AONB • and that if a footnote 6 policy provides a clear reason for refusal under limb 11d(i), the assessment of titled balance in limb 11d(ii) is irrelevant and must not be applied. Case: Monkhill Limited and SoS for HCLG and Waverley Borough Council [2019] EWHC 1993 (Admin)</p>	
--	---	--

	<p>The Chiltern and South Bucks local plan is not properly justified. No assessment of whether Policies BP4 and BP5 would constitute major development has taken place. The Council has not undertaken or commissioned any ecological surveys as part of the evidence base. There is a lack of evidence of a brownfield first or urban capacity approach, the allocations appear to have relied on a Call for Sites and then selected from the mainly greenfield sites submitted.</p> <p>The draft plan is not consistent with national policy. It makes two allocations for major development within the Chilterns AONB (BP4 and BP5). In doing so it is inconsistent with NPPF para 172 as it fails to give great weight to conserving and enhancing the natural beauty of the AONB, fails to limit development in the AONB, and ignore the major development in AONB question. National planning policy does not allow major new development in Areas of Outstanding Natural Beauty except in exceptional circumstances because of the likely harm it would cause to the nation’s long term interest of conserving these places.</p> <p>Suggested modification: The plan should be paused and the geography of local plans reconsidered once the Bucks unitary authority has been formed. Consideration should be given to a future Chilterns AONB local plan, following the example of the Arnside and Silverdale AONB plan, the first AONB-wide DPD in the UK. It has been successfully through examination and adoption. It takes a landscape capacity approach to development in order to ensure that the primary purpose of AONBs – conserving and enhancing natural beauty – is met, ensuring their future for the nation. The allocations BP4 and BP5 within the AONB should be deleted. Policy DMPP1 should not apply to any villages within the nationally protected landscape of the Chilterns AONB. Development levels should be reduced to within the environmental capacity of the area, in particular sustainable water supply, in order to protect the chalk aquifer and chalk streams.</p> <p>Do you consider the Local Plan to have met the requirements of the Duty to Co-operate? No. The Chilterns Conservation Board would welcome being akin to a Duty to Co-operate partner. We are the statutory public sector body for the Chilterns AONB, established by Parliamentary Order. We are the only organisation that covers the whole Chilterns AONB. We would welcome being invited to work on a Memorandum of Understanding or Statement of Common Ground. We have not been involved in draft discussions on this local plan since November 2017 when we made comments on the draft Landscape Capacity Study.</p> <p>Policy DMNP1 This policy is based on the Chilterns AONB model policy, the development of which was a suggestion of a local policy planner from Chiltern District. It is a good example of co-operation between neighbouring authorities on a larger than local issue. It aims to provide a good practice AONB policy and offer consistency across the 13 local authorities. The policy has been slotted in (with various minor changes) to a number of local plans so far, for example</p>	
--	--	--

	<p>Central Beds Local Plan Policy EE7: The Chilterns AONB which is currently at examination, and the Vale of Aylesbury Local Plan Policy NE4: The Chilterns AONB and setting.</p> <p>There has been a recent (March 2019) update to the model policy to reflect the new stronger wording in the NPPF para 172 on AONBs. The version in NP1 therefore needs updating to the Model Policy V2. This is because the changes to the NPPF in 2018 require at para 172 great weight to conserving and enhancing landscape and scenic beauty in AONBs. The words ‘and enhancing’ are new to the NPPF. It is therefore no longer appropriate for the local plan policy to say conserve and, where possible, enhance”</p> <p>Policy DM NP6 fails to mention chalk streams. This is a very important issue in Chiltern and South Bucks districts but the plan fails to grasp the nettle. Policy NP6 does not provide for effective protection of the chalk streams, and the plan’s proposed allocations threaten chalk streams. The Plan should seek to ensure that future development does not have a detrimental impact on these important chalk streams. The plan does not adequately take into consideration the likely impacts of climate change, specifically regarding the increase in flooding events and also the impact on available water resources in future. These factors will limit the both the level of development and also where it can occur. The chalk aquifer is over-abstracted and the situation requires a moratorium on development in the area until solutions are found.</p> <p>The plan should also refer to the Chilterns Chalk Streams Project (a partnership project based at the Chilterns Conservation Board including the water companies, Environment Agency, Wildlife Trusts, Chiltern Society and Chiltern District) as parties to consult over whether a planning proposal is acceptable.</p> <p>Policy SP PP1 -There is no evidence base assessing the effects of inseting these villages. The villages are not part of the Councils’ Landscape Capacity Study for Green Belt Development options by Terra Firma. The policy proposals are not justified. Delete the proposals for inset villages where these are in the Chilterns AONB. The policy title is ‘Protected – Green Belt’ but this is a misnomer, the policy actually releases significant areas from the Green Belt. Releasing land from the Green Belt is not protecting the Green Belt as set out in the NPPF. There is no justification for plan to make these releases with the unitary authority on the close horizon. Neither the policy nor the supporting text on villages to be inset from the Green Belt make any reference to whether the villages are within the nationally protected landscape of the Chilterns AONB to which NPPF para 172 applies. The areas inset are generously drawn and with the sites included there is no confidence that the policy will enable only ‘minor’ windfall development. The policy is not effective.</p> <p>Policy DM PP1</p> <p>The widely drawn village boundaries have not been justified. Much of the land is highly unsuitable for inclusion, for example at Cholesbury the boundary line includes an iron-age hillfort currently the subject of a Heritage Lottery funded project on Hillforts at the Chilterns Conservation Board.</p>	
--	--	--

	<p>Re-draw boundaries to exclude heritage, biodiversity and community assets. Delete all villages in the nationally protected AONB.</p> <p>SP BP2 Chesham The Council's own landscape evidence Landscape Capacity Study for Green Belt Development options by Terra Firma has been ignored in proceeding with this allocation, which recommends only a reduced development area (shown in purple hatching on the diagram below) for 115 dwellings. There is no landscape capacity for 500 dwellings. This large greenfield site is in the setting of the Chilterns AONB. The proposed major expansion of Chesham is likely to increase traffic and air pollution through the AONB, increase recreational pressure on the AONB, and affect the chalk streams through increased abstraction to service the 500 new dwellings, most likely to be taken from Alma Road at the head of the River Chess, one of the finest chalk streams in the Chilterns which suffers from chronic low flows. A recent Environment Agency report "The Upper Chess Low Flows Investigation" confirms there is a causal link between current abstraction and low flows in the River Chess. There is also a threat from effects of increased sewage load on the Chesham STW which periodically releases sewage effluent into the River Chess. Reduce development to within environmental limits, based on a landscape-led approach, and protecting the River Chess.</p> <p>SP BP3 Holmer Green This large greenfield site is in the setting of the Chilterns AONB. The three areas of Priority Habitat - Traditional Orchard on the site must be preserved and protected, not developed. The once large number of cherry orchards in the Chilterns continues to decline to the point they are now a fast vanishing feature of the landscape. Reduce development to within environmental limits, based on a landscape-led approach, and protecting chalk streams and the Traditional Orchard priority habitat on the site.</p> <p>SP BP4 Area South of London Road West, Amersham Old Town. The Council has not justified the allocation with an assessment against the tests for major development in the AONB under NPPF para 172. It should not proceed. Chilterns Conservation Board objects strongly to this allocation, in principle and because of the chalk stream on the site. Its development would not conserve and enhance the Chilterns AONB. BP4 is a greenfield site in the AONB and 40 dwellings is likely to constitute major development in the AONB, because of the scale of the development in relation to the size of the settlement of Old Amersham, the effect on views, and the sensitivity of the location which contains a chalk stream, and the nearby listed buildings. National policy in NPPF para 172 would apply, namely that such a development should be assessed against the tests for major development in the AONB and that planning permission should be refused if it fails to meet them. This NPPF para 172 assessment has not been done. Great weight has not been accorded to conserving and enhancing the landscape and scenic value of the AONB. A chalk stream, the River Misbourne, runs along the side of the site. The river is not recognised in the policy or supporting text, which simply mentions the need for a flood risk assessment. There are</p>	
--	--	--

	<p>no safeguards for the river; the policy provides no buffer to protect the stream or the recreational enjoyment of footpath users. Along this stretch the river Misbourne is 'perched' and the stream bed is vulnerable to harm from nearby construction which could alter the hydrology. The course of the river has already been artificially altered on this site (hence the kink) during the construction of the A413. Furthermore, Sustainable Urban Drainage Systems (SUDs) might be difficult on this site because of the risk of polluted run-off draining into the chalk stream. The river's water quality is likely to be affected from surface water run-off. Its wildlife would be disturbed by a new adjacent housing development, with litter, domestic animals and recreational disturbance.</p> <p>The local plan shows a lack of recognition that the site is in a nationally protected landscape, contains an internationally scarce chalk stream, that the site slopes, and there is inter-visibility with wider AONB views including from the South Bucks Way and Martyrs Hill, as well as views to the church and historic core of Old Amersham (the Old Amersham Conservation Area).</p> <p>The Council has yet to commission any ecological survey work to support the allocations in the plan. Ecological and environmental impacts of this allocation are unacceptable and proceeding with the allocation would be contrary to national guidance on landscape and biodiversity.</p> <p>The effects on the natural environment of supplying water to this site need proper consideration (it is not just a question of whether the water company is able to supply). Chalk streams are a globally rare habitat and the Chilterns chalk streams are under pressure from abstraction for water supply, and pollution incidents arising from inadequate waste water infrastructure. Water supply to service the development would be likely to be met through increased abstraction from chalk streams, in this case the River Misbourne, leading to even lower flows of this already over abstracted chalk stream which is failing Water Framework Directive standards. Increased abstraction to serve the development would further deteriorate its condition.</p> <p>Delete allocation. It is not justified and is positively harmful to the Chilterns AONB.</p> <p>SP BP5 Area South East of Whielden Street, Amersham Old Town The Council's own landscape evidence Landscape Capacity Study for Green Belt Development options by Terra Firma has been ignored in proceeding with this allocation, which recommends against development of this sensitive site. It is unclear why the site is allocated.</p> <p>The Council has not justified the allocation with an assessment against the tests for major development in the AONB under NPPF para 172. It should not proceed.</p> <p>Chilterns Conservation Board objects strongly to this allocation, in principle and because of the valuable natural environment assets on the site. Its development would not conserve and enhance the Chilterns AONB.</p> <p>BP5 is a greenfield site in the AONB and 50 dwellings is likely to constitute major development in the AONB, because of the scale of the development in relation to the size of the settlement of Old Amersham, the ecology, the sloping topography, the effect on views, and the sensitivity of the location next to an area rich in architectural heritage and designated heritage assets (adjacent to</p>	
--	---	--

	<p>listed buildings and the Old Amersham Conservation Area). National policy in NPPF para 172 would apply, namely that such a development should be assessed against the tests for major development in the AONB and that planning permission should be refused if it fails to meet them. This NPPF para 172 assessment has not been done. Great weight has not been accorded to conserving and enhancing the landscape and scenic value of the AONB. Incredibly, neither Policy BP5 nor its supporting text acknowledges that the site is within the Chilterns AONB. In terms of settlement pattern, Old Amersham is a valley bottom settlement set in the valley of the River Misbourne, with a development form that is compact and restricted by the rising valley sides (see Chilterns Buildings Design Guide). Developing the whole site would creep development up those sloping valley sides, damaging the character of the settlement as a historic village nestling in a green backdrop of hills. There is inter-visibility with wider AONB views including from Martyrs Hill, as well as views to the church and historic core of Old Amersham (the Amersham Old Town Conservation Area).</p> <p>In fieldwork in June 2017 I noted pyramidal orchids, and a diversity of invertebrates including a large number of large active ant mounds in the south western end of the site near the hospital. This was also recorded in the Council's own landscape evidence Landscape Capacity Study for Green Belt Development options by Terra Firma which reports chalk grassland habitat, including orchids. Chilterns Conservation Board takes a zero- tolerance approach to loss of chalk grassland. The Council has yet to commission any ecological survey work to support the allocations in the plan. Ecological and environmental impacts of this allocation are unacceptable and proceeding with the allocation would be contrary to national guidance on landscape and biodiversity. The effects on the natural environment of supplying water to this site need proper consideration (it is not just a question of whether the water company is able to supply). Chalk streams are a globally rare habitat and the Chilterns chalk streams are under pressure from abstraction for water supply, and pollution incidents arising from inadequate waste water infrastructure. Water supply to service the development would be likely to be met through increased abstraction from chalk streams, in this case the River Misbourne, leading to even lower flows of this already over abstracted chalk stream which is failing Water Framework Directive standards. Increased abstraction to serve the development would further deteriorate its condition.</p> <p>Delete allocation. It is not justified and is positively harmful to the Chilterns AONB.</p> <p>SP BP6 Little Chalfont This large greenfield site south east of Little Chalfont is in the setting of the Chilterns AONB. The Council's own landscape evidence Landscape Capacity Study for Green Belt Development options by Terra Firma recommends only a reduced development area (shown in purple hatching on the diagram below) for 547-638 dwellings. There is no landscape capacity for 700 dwellings. The study concludes "Development on site 6 is constrained by the need to protect existing trees and woodlands, to protect views from the edge of the AONB and the rural character of Lodge Lane, and to keep built form out of the dry valley landscape, in line with identified special qualities of the AONB.</p>	
--	--	--

		<p>Reduce numbers to 547-638 dwellings and to the development area recommended in the Council's study. The site contains two parcels of Ancient Woodland, the policy should require they are linked up. Lodge Lane to the east of the site, and Stony Lane beyond this, are very scenic rural lanes in the Chilterns AONB. Any access or highway 'improvements' to Lodge Lane or Stony Lane (eg widening, straightening, signage, traffic lights, street lighting) would harm the AONB, and the Chilterns Conservation Board would be likely to object. It would be contrary to the advice in the Environmental Guidelines for the Management of Highways in the Chilterns which was produced by the Board and partners including Buckinghamshire County Council. Reduce development to within environmental limits, based on a landscape-led approach, keeping below thresholds which trigger highway works to Lodge Lane and Stony Lane, protecting ancient woodland and flows in chalk streams.</p> <p>SP BP9 Land east of Beaconsfield This very large greenfield site south and east of Beaconsfield is in the setting of the Chilterns AONB. The policy should address the setting of the AONB. 1,600 homes, 20,000sqm of economic development floorspace and 15 pitches for Gypsies and Travellers would increase water abstraction from the chalk aquifer at both the construction and operational phases which would further reduce flows in chalk streams, in this case the River Misbourne. Reduce development to within environmental limits, based on a landscape-led approach and the importance of protecting and restoring flows in the River Misbourne.</p> <p>CCB also submitted comments on the Local Plan's Sustainability Appraisal questioning the methodology, scoring and absence of inclusion of landscape evidence prepared by consultants for the Council or consideration of the Chilterns Beechwood SAC.</p>	
<p>Luton AD6 airspace changes, Airspace Modernisation</p>	<p>London Luton Airport Airspace Change</p>	<p>AD6 consultation on Luton arrivals. CAP1616 requires specific attention is given to tranquillity of AONBs. Great weight should be given to minimising over-flying of the Chilterns AONB. The opportunity should be taken to re-prioritise the AONB and re-organise airspace to reduce overflying of the AONB and improve the tranquillity of one of the country's finest landscapes and a nationally important visitor destination. In summary, we are looking for an airspace change that provides quieter, cleaner, greener, more tranquil scenario over the Chilterns AONB than the existing situation. Airspace change should bring better protection the Chilterns AONB as a strategic greenspace resource and one of the nation's finest landscapes. We welcome the scope for modern satellite navigation, steeper climb profiles and quieter aircraft to improve the current situation.</p> <p><u>Analysis of proposals</u></p> <p>From the maps you have provided, it appears that some areas of the AONB would no longer be overflown, and we welcome this. The positioning of the proposed new hold NUHAT and the routes from the hold onto final approach would reduce the area of flightpaths over the AONB around Sharpenhoe and Streatley. It would also relieve the AONB to some extent at its margins near Pitstone through concentration of flightpaths.</p>	<p>18.9.19</p>

	<p>However if the number and frequency of flights using the new concentrated flightpaths increases, any benefits to the AONB by adjusting routes could be outweighed.</p> <p>We are concerned that the options for flightpath change do nothing to help reduce noise over the final approach. With aircraft taking off and landing directly over the Chilterns AONB to the west of Luton, options should be progressed for avoiding and mitigating the impacts on the AONB. We understand the final 8 miles is a fixed and unchangeable route, but the straight line over the AONB is much more than 8 miles long, what scope for alternative routes might be available further back?</p> <p><u>Analysis of proposals by direction</u></p> <ul style="list-style-type: none"> • On easterlies, the inbound routes now miss the AONB, which is welcome. We recommend the final route(s) selected from the feasible options to be ones that avoid the AONB by the biggest margin. • On westerlies, neither the existing nor the proposed routes from the hold to the runway are near to the AONB, so in that sense the change is neutral. However, in practice, aircraft often do not fly the full route all the way to the hold and back, but use short cuts. That is why on page 38 there are many flightpath traces running west-east over or just to the north of the AONB south of Silsoe: these are aircraft mostly from the north (but sometimes from the west or south-west) that are vectored and descended early because traffic permits. Even if the scope for giving short cuts remains, the changes may be beneficial for the AONB, because traffic from the north will generally get turned earlier towards the new northward and westward-shifted hold, with any intervention for a short cut occurring later. • Short-cuts are a significant factor for the AONB with easterlies. Aircraft from the south are often taken off route to the south of Heathrow, then vectored over or just to the west of Heathrow before joining the Luton centreline 15 or 20 miles out. This takes them over places like Stokenchurch and Chinnor, and although they are usually at heights of 7000 or 8000 feet, they are often quite noisy because they are putting flaps out to slow down. This “temptation” / justification (because it saves them so many miles compared with the full route to Lorel and back) will remain in the future. As a result, we recommend there is a case for banning short cuts over the AONB in order to realise the full benefits of the proposed changes. Lack of comprehensive re-design process <p>We are concerned that pressing ahead with a Luton flightpaths airspace change ahead of FASI-South may prevent the best holistic solution being reached. Luton airspace changes may present a fait accompli to FASI-South. There are cumulative impacts and complex interactions between Heathrow and Luton, and both affect the Chilterns AONB. It is important that in any redesign of flightpaths there is careful design to avoid harm to the tranquillity of the AONB. We see potential opportunities for improvements like the removal of the Bovingdon stack, and the end of Heathrow stacking</p>	
--	---	--

	<p>above the Chilterns AONB which has the knock-on effect of keeping Luton flights low.</p> <p>We are also unclear why a new hold NUHAT is proposed when the general move is an end to stacking through the introduction of technologies like PBN.</p> <p><u>Assessment needs</u></p> <p>In the next stages of work, AONB impacts should be identified, explored, and, following the mitigation hierarchy, avoided, mitigated and, as a last resort, offset.</p> <p>Without an assessment of the noise implications of the potential new flightpaths it is very difficult to comment, and we reserve the right to give a considered response later once more information is available. The flightpaths mapping does not show for example:</p> <ol style="list-style-type: none"> 1. How much noise would be experienced under the flightpaths 2. How wide an area would be impacted below any given flightpath line on the map 3. How frequently each flightpath would be used 4. How the impacts of 1 to 3 above compare with the existing situation. <p>It is only through assessing impacts on the AONB and making decisions accordingly that you can demonstrate that you have had regard to the AONB, as required by Section 85 of the Countryside and Rights of Way Act 2000 which places a statutory duty on public bodies including NATS and CAA, 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.</p> <p>For the assessment we would like to see the AONB mapped for existing ambient noise levels. We would like proposals to ensure that the quietest and most visited areas of protected countryside remain as quiet as possible. This could help ensure that decisions are evidence based to protect the most iconic places, e.g. visitor hotspots such as Ivinghoe Beacon, the Ridgeway National Trail, the Ashridge National Trust estate), recognising their importance for quiet recreation, health and wellbeing.</p> <p>We recommend your assessment includes impacts of</p> <ol style="list-style-type: none"> 1. Aircraft noise: caused by associated changes in overflying of the Chilterns AONB. 2. Visual intrusion from aircraft: motion from over flying aircraft at all heights. It is already commonplace to be able to see and hear several aircraft at once. 3. Loss of Tranquillity: the combination of aural and visual intrusion and associated sense of activity deprives much of the Chilterns of the sense of tranquillity which it should have and deserves as a nationally protected area. People walking, cycling, riding or volunteering in the AONB are likely to be outdoors and expecting to enjoy an experience of 'getting away from it all'. They are more noise sensitive than those indoors 4. Disturbance: especially night flights and early and late arrivals 5. Levels of air pollution and effects on plants and sensitive habitats in the Chilterns including protected sites of national and 	
--	---	--

	<p>international importance 6. Contrails: the large numbers of over-flying aircraft are generating considerable numbers of contrails</p> <p>Closing comments</p> <p>We would welcome the Chilterns Conservation Board being involved in the proposals going forward to ensure that full and proper account is taken of the need to conserve and enhance the natural beauty of the AONB, which has the same status in planning as a National Park, including opportunities taken for flightpath changes to reduce overflying of the AONB.</p>	
<p>Heathrow Airport Statutory consultation on expansion</p>	<p>The Chilterns AONB is likely to be impacted the expansion of Heathrow by:</p> <ul style="list-style-type: none"> • The impact of flightpaths on the tranquillity and public enjoyment of the AONB; • The impact on air quality of the AONB; • The impact on wildlife and habitats of the AONB, including Chilterns chalk streams and European habitats sites (Special Areas of Conservation); • Heating of the local housing market from job growth, affecting the affordability of housing for local communities in the Chilterns; and • Climate change impacts on the AONB. <p>Preferred Masterplan</p> <p>The Chilterns Conservation Board objects to the proposed moving and culverting of the tributaries of the River Colne. This will fragment habitats, degrade natural river channels and interrupt natural processes. It will thwart the opportunity for otters, water voles, eels, fish and invertebrates to move freely and migrate upstream into Chilterns chalk streams, which are internationally rare and threatened habitats. 85% of the world’s chalk streams are in Southern England, and the Chilterns AONB contains the largest cluster. None of 9 Chilterns chalk streams is currently meeting Water Framework Directive standards in Directive 2000/60/EC, mainly because of over-abstraction to supply water. An expanded airport is likely to continue the existing regime of netting local waterbodies and oiling birds eggs, which impacts on species, food chains and ecological networks.</p> <p>We welcome the proposed Green Loop but would like to see HAL invest in better green links up to through the Colne Valley Regional Park and through to the Chilterns, rather than just circling the airport with a narrow band of green. Although the masterplan mentions the Chilterns (once), explaining that “Heathrow sits between the natural floodplains of the Colne Valley and Crane Valley, which form corridors made up of woodland, meadows, wetlands and watercourses connected with the wider landscape linking the Chilterns with the River Thames” it contains no proposal for investing in and strengthening those links to the Chilterns.</p> <p>We welcome the mention of a Heathrow Experimental Farm where local provenance tree and hedge species could be sourced. A local tree nursery could help reduce the threat of the Heathrow project bringing pests and trees diseases which could threaten the woodlands of the Chilterns.</p>	<p>12.9.19</p>

	<p>Travelling to and from Heathrow - Surface Access</p> <p>On surface access, we welcome the pledge not to increase landside airport related traffic, but are concerned about how realistic it is to deliver this and the lack of sanctions to ensure it happens. We find the inclusion of plans for the world's two largest car parks incompatible with the pledge.</p> <p>It is vital that the airport expansion does not increase traffic through the Chilterns AONB. The Chilterns contains many nationally and internationally protected biodiversity sites which are close to main transport corridors. For instance the M40 motorway cuts directly through the Aston Rowant Special Area of Conservation and passes close to the Chiltern Beechwoods Special Area of Conservation. All three of the SACs in the Chilterns AONB have already breached the critical loads for air pollution. For example, see Natural England's Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018: "The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it."</p> <p>Increased traffic on the roads through the Chilterns like the M40, A4010, A41 or B4506 will be a threat to the ecology of our highest status biodiversity sites. Part of the M25 also runs through the Chilterns AONB near junction 18.</p> <p>We are also concerned about increased traffic leading to pressure for north-south highway improvements through the Chilterns (e.g. dualling, widening, straightening, signage, traffic lights, street lighting) which would in many places be inappropriate, harming the rural character, air quality and tranquillity of the AONB. This is explained further in the Environmental Guidelines for the Management of Highways in the Chilterns, produced by the Chilterns Conservation Board and partners including Buckinghamshire County Council.</p> <p>The plans for a Heathrow Ultra-Low Emissions Zone, and, post opening of the third runway, a Heathrow Vehicle Access Charge, are likely to deter some cars from entering the airport but will not protect the wider area including the Chilterns from increased through-traffic if the new parkways are outside the Zone. The Zone is also likely to increase demand for private airport car parks just outside the Zone as people create strategies for avoiding the charge. There is a risk of undesirable unofficial satellite car parks in rural areas including the southern part of the AONB.</p> <p>Future Operations</p> <p>Runway Alteration Westerly departures from the new northern runway are likely to have the most impact on the Chilterns AONB. We suggest:</p>	
--	---	--

	<p>1. It would help minimise impacts on the Chilterns AONB if the new northern runway was used predominately for westerly arrivals. 2. Respite for the AONB should especially be provided at times when it is most visited, for example at the weekends. 3. If westerly departures on the northern runway were restricted to the quietest and most low emissions aircraft, this could help make a positive contribution to conserving and enhancing the tranquility and air quality of the Chilterns AONB, and incentivise technological improvements in the fleet.</p> <p>These three measures would be a positive way for HAL to demonstrate regard to conserving and enhancing the natural beauty of the Chilterns AONB (as required by Section 85 of Countryside and Rights of Way Act 2000). Directional Preference Great weight should be given to minimising over-flying of the Chilterns Area of Outstanding Natural Beauty, this should influence the directional preference. Westerly departures have the greatest negative impact on the AONB. The greatest impact on quiet enjoyment of the AONB is likely to be during weekend in the summer months, so reducing westerly departures, particularly at these times, would help the AONB and demonstrate regard to conserving and enhancing the natural beauty of the Chilterns AONB.</p> <p>Night flights We welcome the proposed formal ban on night flights.</p> <p>Early Growth We are concerned that with Early Growth the number of flights and associated negative environmental impacts could run ahead of the mitigation measures and surface access proposals.</p> <p>Managing the Effects of Expansion</p> <p>Noise</p> <p>The Chilterns Conservation Board is concerned that the maps comparing noise levels show a greater area of the Chilterns AONB exposed to aircraft at 7,000 feet in 2035 than in 2013, and some southern areas of the AONB exposed to aircraft below 4,000 feet above mean sea level (Fig 15.2 of PEIR Vol 2). This is an increase, not decrease, in the extent of the AONB impacted by Heathrow. It tells us only height, and nothing about the frequency of aircraft or actual noise likely to be experienced. All of the Chilterns AONB south of Luton would in future be within the 7,000 ft zone. Cumulatively with planned growth of Luton Airport (not shown in this mapping), there is a serious risk of future deterioration in tranquillity in the AONB.</p> <p>CAP1616 requires specific attention is given to tranquillity of AONBs. Great weight should be given to minimising over-flying of the Chilterns Area of Outstanding Natural Beauty (AONB). The opportunity should be taken to re-prioritise the AONB and reorganise airspace to reduce overflying of the AONB and improve the tranquillity of one of the country's finest landscapes and a nationally important visitor destination. It is more important to keep tranquil rural areas in nationally protected landscapes quiet than it is to reduce noise in urban areas which already experience high levels of background noise from traffic and aircraft so that airspace changes are less noticeable. Tranquil valleys are one of the</p>	
--	--	--

	<p>identified special qualities of the Chilterns AONB identified in the statutory Chilterns AONB Management Plan. People experience aircraft noise most when they are outdoors. Effects of overflying the AONB include the loss of tranquillity resulting from aircraft noise, visual effects of seeing aircraft move through the sky, contrails and lights from aircraft.</p> <p>The Chilterns Hills AONB is a high chalk ridge, so taking account of actual ground levels is important, rather than height above mean sea level. Flightpaths should take account of where people visit for leisure time and when people are more likely to be outdoors in the Chilterns Area of Outstanding Natural Beauty (AONB). The highest numbers of visitors to the Chilterns AONB are found at weekends and holiday periods, so respite at those times would benefit more people enjoying outdoor activities. We would like to see the AONB mapped for existing ambient noise levels and proposals that ensure that quiet areas of protected countryside remain as quiet as possible, recognising their importance for quiet recreation, health and wellbeing. Over 10 million people live within an hour's travel of the Chilterns AONB, and over 55 million leisure visits are made to and within the Chilterns AONB every year.</p> <p>We would welcome the opportunity of airspace change processes to re-prioritise the peace of the AONB and re-organise airspace to reduce overflying. Airspace change should bring better protection the Chilterns AONB as a strategic greenspace resource and one of the nation's finest landscapes. We welcome the scope for modern satellite navigation, steeper climb profiles and quieter aircraft to improve the current situation, set out in the Heathrow Airspace consultation earlier this year. In particular, we look forward to the end of stacking above the Chilterns AONB (the Bovingdon stack) which has the knock-on effect of keeping Luton flights low.</p> <p>We are disappointed to find little reference to the Chilterns AONB in the consultation documents. This is an omission we hope to see remedied in the ES which should provide full information on flightpath impacts and noise over the Chilterns AONB. We note that Chapter 15 of the Vol 1 of the PEIR refers to "Further engagement will take place following issue of the PEIR and prior to issue of the ES, including with the Chilterns AONB Conservation Board." We await and would welcome this engagement. Please note that with adoption and publication of the new Chilterns AONB Management Plan 2019/2024, the references in the PEIR need to be updated to the new plan and its policies, which includes Policy DP14: Avoid new or upgraded infrastructure (roads, railways, airports, pylons, masts etc.) which harm the AONB landscape, nature, air quality, tranquillity or the visitor experience. Fully assess impacts on the AONB, including increased recreation pressure, traffic, overflying and severance of ecological connectivity in the AONB. Avoid, mitigate and compensate to achieve a net gain for the AONB.</p> <p>Biodiversity</p> <p>We note and welcome the commitment to biodiversity net gain, but the plans lack vision or detail on how and where this would be delivered. We are concerned with the statement "our commitment to biodiversity net gain for the Project will be demonstrated through the use of biodiversity offsetting" which disregards the Government</p>	
--	---	--

		<p>policy’s well-established mitigation hierarchy. Rather than jump to off-site offsetting through financial contributions, the mitigation hierarchy requires that impacts are avoided, mitigated and, only as a last resort, offset.</p> <p>Carbon</p> <p>We welcome the stated intention to make growth from the new runway carbon neutral but have serious concerns about the ability to deliver this while expanding the airport and its operations so significantly. It is not clear how expansion from 480,000 to 756,000 flights a year and the construction of the two biggest car parks in the world is compatible with the Climate Change Act. It is not clear how emissions will be avoided, mitigated or offset in order to meet UK legislation requiring net zero greenhouse gas emissions by 2050.</p> <p>As set out in the new Chilterns AONB Management Plan 2019-2024, climate change is expected to have a major but unpredictable influence on the natural beauty and natural capital of the Chilterns. It is likely that the long term changes will alter the species composition of woodlands and the type of crops grown by farmers leading to alteration to the landscape. The Chilterns can make a significant contribution to helping mitigate climate change in ways that are compatible with conserving and enhancing its natural beauty. These include: carbon capture and storage in Chilterns woodlands and soils, storage and provision of water from the chalk aquifer, resilient ecological networks to allow species movement in response to climate change, local food and wood products, and the Chilterns as ‘staycation’ destination. As the climate changes and people try to reduce their carbon footprint, more people may decide to holiday in the UK rather than to go abroad, making the Chilterns even more valuable in a national context as sustainable alternative for short and long visits, an outstanding landscape accessible by public transport and on the doorstep of millions in the south east.</p> <p>Closing comments</p> <p>The Chilterns Conservation Board is not currently satisfied that the emerging plans for Heathrow expansion would conserve and enhance the Chilterns AONB. AONB impacts should be explored, and, following the mitigation hierarchy, avoided, mitigated and, as a last resort, offset. We would welcome the Chilterns Conservation Board being involved in the proposals going forward to ensure that full and proper account is taken of the need to conserve and enhance the natural beauty of the AONB, which has the same status in planning as a National Park, including opportunities taken for flightpath changes to reduce overflying of the AONB</p>	
<p>Wallingford Neighbourhood Plan Reg 14 consultation</p>	<p>Walingford Town Council</p>	<p>This is a strong and well thought out neighbourhood plan.</p> <ul style="list-style-type: none"> • The Chilterns Conservation Board supports the emphasis on a compact and locally appropriate level of growth. • We support no additional housing allocations given the existing commitments. 	<p>17.10.19</p>

		<ul style="list-style-type: none"> • In particular, we support Policy WS1.4 ensuring that all development conserves and enhances the rural setting of Wallingford, the views leading to and from it, the landscape character and biodiversity. • We support Policy CF4.1 on the Riverside Meadows. • Wallingford is wrapped round by two nationally protected landscapes: the Chilterns and North Wessex Downs AONBs. Part of your neighbourhood area includes the Chilterns AONB (near Wallingford Bridge), please be aware that general neighbourhood plan policies will apply here unless you have specified otherwise. • Wallingford falls very much within the setting of the Chilterns AONB. You could usefully add the words ‘setting of the AONB’ to the plan and include a policy on it. As an example of wording, we have a policy about development in the setting of the AONB at policy DP4 of the new Chilterns AONB Management Plan. • You rightly identify cumulative impacts of the growth already consented or emerging at Wallingford and nearby villages. We are concerned that while a single planning proposal may affect only a small area of the AONB, a number of similar developments in the area, incremental changes over time, or a series of new developments in sequential views along an important trail, can have a significant cumulative impact. Noise and traffic through the Chilterns AONB are likely to increase and this must be tested carefully through Strategic Environmental Assessment. The character of the AONB, its wildlife and people’s enjoyment could slowly diminish over time. We have further advice in our Position Statement on the Cumulative Impacts of Development on the Chilterns AONB. • On policy HD2.3 we recommend that the policy is expanded to address light spill into the countryside (at the moment it refers to environmentally sensitive locations and near bedrooms). AONBs are intrinsically dark environments (Zone E1 in the Institute of Lighting Professionals guidance) and restrictions and controls should be exercised to keep dark skies. Please see policy DP8 in the Chilterns AONB Management Plan. Lighting of large employment buildings and sports facilities at Hithercroft is something to manage carefully, since this area is visible from the Ridgeway and higher land in the AONB southeast of Crowmarsh Gifford. • On policy EE1 for site C, it is important to address buildings heights, bulk and reflectiveness of materials in order to safeguard the views from the AONB, and we feel more detail could be added to Policy EE1 on the designs and solutions you seek. 	
--	--	---	--

<p>Outline Transport Strategy</p>	<p>England's Economic Heartlands</p>	<p>Our key recommendation is that the Outline Transport Strategy recognises the Chilterns AONB as a nationally protected landscape and develop special and distinctive transport strategy recommendations for this area.</p> <p>By taking a different approach for the AONB, EEH will be demonstrating regard to the AONB, which is a statutory requirement under the Countryside and Rights of Way Act 2000 Section 85. Great weight should be given to conserving and enhancing the Chilterns AONB. Every opportunity should be taken to re-prioritise the AONB and re-organise transport to reduce through-traffic across the AONB and improve the tranquillity of one of the country's finest landscapes and a nationally important visitor destination. Some routes in the hierarchy could be re-designated as access only or traffic free to encourage safe cycling. The strategy could break new ground by finding solutions with quiet zero carbon transport and enhanced opportunities for healthy active travel. The only other protected landscape starting to develop proposals like this is the Lake District with their Smarter Travel programme.</p> <p>Another good reason for adding the dimension of the AONB to the Outline Transport Strategy is to look ahead for change. The Glover Review has been published. This is an independent review commissioned by DEFRA on whether the protections for National Parks and AONBs are fit for purpose. It makes some radical suggestions for an overhaul, so that protected landscapes serve the nation better, with bigger ambitions to be happier, healthier, greener, more beautiful and open to everyone. For the Chilterns it suggests National Park status and the need for a single local plan covering the Chilterns. This is the most clearly-stated Glover recommendation for any AONB, recognising the leisure importance and pressure on the Chilterns, and referencing OxCam in its justification for this.</p> <p>Our request is that the Chilterns be fully factored into OxCam and EEH strategic planning, not only because of its inherent landscape quality and vulnerability, but specifically because it offers a prime leisure / quality of life asset for existing and new residents. This makes it a key component for the EEH strategy, not least in demonstrating its proper consideration of environmental and recreation issues.</p> <p>We suggest three specific things:</p> <ol style="list-style-type: none"> 1) Full recognition of Chilterns as a 'sensitive receptor' in Strategic Environmental Assessment (SEA). 2) Ditto in the approach to north-south links passing through Chilterns. 3) Ditto in the associated studies to inform OxCam growth (e.g. Connectivity Study) <p>In Appendix 2 we provide a more detailed response structured around the questions in the consultation document.</p> <p>In summary, we are looking for change that provides quieter, cleaner, greener, more tranquil transport in the Chilterns AONB than the existing situation. There is an opportunity for change to bring better protection the Chilterns AONB as a strategic greenspace resource and one of the nation's finest landscapes. We welcome the scope for innovative technology, combined with a careful transport strategy, to improve the current situation. We</p>	<p>28.10.19</p>
-----------------------------------	--------------------------------------	--	-----------------

	<p>welcome your future continuing engagement with the Chilterns Conservation Board to do this. In Appendix 2 we provided a more detailed response structured around the questions in the consultation document. Of note we highlight below responses to:</p> <p>Q1. Does the draft vision ("connecting people and places with opportunities and services") provide sufficient focus for the Transport Strategy? A. We feel there is a need for the EEH transport strategy to have (as a fundamental building block) a broad ranging and ambitious Vision for the Chilterns, supported with a strategy that is focussed on protecting and enhancing the special qualities of the Chilterns, but one that also complements the aspirations of the OxCam arc in the way the Glover Review recommends.</p> <p>Q11. Are there specific issues that should be taken into consideration as part of the connectivity studies? A. For the North-South strategic transport corridor, a careful approach is needed to ensure no greater impact on the nationally protected landscape of the Chilterns AONB. These impacts include air pollution, noise, light pollution and harm to public enjoyment from loss of tranquillity. As well as human wellbeing, there are also biodiversity reasons for exercising restraint. Road kill, disturbance, air pollution from traffic, and polluted surface water run-off from roads all have impacts on wildlife, so that no matter how much conservation effort goes into managing our designated sites like Sites of Special Scientific Interest, National and Local Nature Reserves, we can still lose rare and distinctive species. The Chilterns AONB contains 3 Special Areas of Conservation (SACs), two of which adjoin motorways or A roads (e.g. M40, A41, A4010, A40). These SACs in the Chilterns AONB are European level biodiversity sites, protected under the Habitats Directive. This requires any plan or project likely to have a significant effect, either individually or in combination with other plans or projects, to be subject to Appropriate Assessment. National authorities can only agree to a plan or project having ascertained that it will not adversely affect the integrity of a SAC.</p> <p>In this case, all three SACs in the Chilterns have already breached the critical loads for air pollution. Their habitat types are considered sensitive to changes in air quality. Exceedance of the critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it. There is further information about the problem in Plantlife's report We need to talk about Nitrogen and Natural England's Supplementary Advice for Chiltern Beechwoods SAC. The growth arc is likely to bring additional north-south traffic through the Chilterns AONB, including for example the M40 which bisects the Aston Rowant SAC (there can't be many places in the country where a motorway goes through a SAC).</p> <p>An example of a north-south corridor strategic transport investment that we welcome is the recently confirmed Misbourne Greenway, a £1.6 million project to create a new traffic-free route through the Chilterns AONB between Uxbridge and Aylesbury being delivered by Sustrans and the Chiltern Society. This new route will better link</p>	
--	--	--

		<p>local communities with schools, businesses and railway stations making it far easier and safer for people to walk and cycle for everyday journeys, as well as providing an excellent new resource for leisure cyclists and walkers.</p> <p>Q20. Is the approach to investment the right one? If not, why not? A. The zero carbon target should be brought substantially forward from 2050 and shape all investment decisions made from this point onwards.</p> <p>Q21. Is the approach to delivery the right one? If not, why not? A. Long term visioning and working in partnership are clearly crucial. The transport sector is rapidly evolving and this region should be at the forefront of new and innovative lifestyles, with a future Chilterns 'National Park' on the doorstep and zero carbon travel.</p>	
<p>Proposed reforms to permitted development rights to support the deployment of 5G and extend mobile coverage</p>	<p>MHLC G and DDCM S</p>	<p>The Chilterns Conservation Board has long expressed its concern about the landscape damage that can be caused by the erection of telecoms masts. AONBs and National Parks are our finest landscapes, containing iconic archaeological, geological and historical sites and valuable wildlife habitats. They are inspiring places for people to improve their health and wellbeing, and are cultural treasures, often used as film and TV sets. More than two thirds of people in England live within 30 minutes of a National Park or AONB. They are also economically valuable, visited by 260 million people every year, spending in excess of £6billion (see NAAONBs report So Much More Than The View). They are home to thriving communities who live and work in these beautiful areas; their annual GVA is £20 billion, similar to that of Birmingham. Protected landscapes are economic assets which should be safeguarded and treasured. Quick and cheap installation of poorly designed phone masts in damaging locations would deeply harm the Chilterns and other nationally protected landscapes.</p> <p>There are potentially more effective methods for achieving mobile coverage than increasing permitted development rights. In National Parks and AONBs existing permitted development rights should be reduced, thereby providing an incentive to use community-based networks utilising building mounted antennae which have a lower landscape impact.</p> <p>We are concerned about the proposals weakening local planning authorities' role in 5G roll out. We have low expectations of industry-led codes or measures, which are akin to letting telecoms companies mark their own homework. The existing Code of Practice has not worked well. There is currently no requirement set out in either The Code in Schedule 3 of the Communications Act 2003 or The Electronic Communications Code Regulations 2003 for Communications Operators to consult with AONB units. AONB Partnerships/Conservation Boards are not statutory consultees, despite Conservation Boards being statutory bodies for Areas of Outstanding Natural Beauty.</p> <p>Relaxation of Permitted Development Rights reduces controls and protection for Article 2 (3) land (which includes Conservation Areas, World Heritage Sites, AONBs, National Parks etc). The requirement for prior approval within AONBs provides an</p>	<p>4.11.19</p>

	<p>opportunity for statutory and nonstatutory consultees and other interested parties to consider any potential harmful effects on the designated landscape and to provide appropriate comment. This allows the determining authority to properly consider the planning balance of such development in the light of both the importance attached to the roll out of 5G technology, and the purposes of AONB designation and statutory duty under Section 85 of the Countryside and Rights of Way Act 2000. The requirement for prior approval for proposals for radio equipment housing within Article 2(3) land should be retained.</p> <p>A blanket allowance for increasing existing mast heights shows no consideration to the location or impacts. Some masts on open hillsides in the Chilterns AONB are already extremely intrusive in views and harmful to landscape character. In other locations, careful siting within woodland and away from key public rights of way make some existing masts unobtrusive and acceptable. Clearly the latter is better sited. However, increasing the height of a mast so that it protrudes well above the canopy may alter how well a mast is hidden in woodland. Similarly, antennae hidden on church towers may be far worse if equipment is made taller. We need the Prior Approval process to provide that careful consideration. AONB Partnership and Conservation Boards should be involved in this decision-making process.</p> <p>Article 2(3) land should be exempted. Conservation Areas, World Heritage Sites, AONBs and National Parks are our national treasures and are significant tourism and economic assets. It is not asking too much to ensure that there is at least some sort of process of checks and balances before tall equipment that could harm their fabric and character is erected.</p> <p>The best way to achieve the right balance is through a planning process rather than permitted development changes. Operators should demonstrate that the development sought provides the best (least worst) environmental outcome. This must include a review of all alternatives considered and an assessment of each in terms of harm to Article 2(3) land, which would allow consideration of whether fewer taller masts or more shorter masts is the best solution for a particular landscape. AONB Partnerships and Conservation Boards should be statutory consultees and involved in this process. Conservation Boards and AONB Partnership Units should be added to the list of those given written notice in the Regulations and should be resourced to comment through a fee paid by the operator to cover the staff costs of a site visit, letter and, if necessary, meeting with the operator.</p> <p>Operators should work together so that a coordinated optimal solution can be found for each National Park or AONB, rather than a sequence of individual Prior Approval processes for different sites taking place over time.</p>	
--	--	--

APPENDIX 6**Current Development Plan Consultations:**

Consultation document	Consulted by	Stage	Deadline for CCB responses
Householder Planning & Design Guidance SPD	WDC	Draft Supplementary Planning Document	22.11.19
Luton Airport Expansion	LLAL	Statutory consultation on expansion Sec 42 Planning Act and Reg 13 Infrastructure Planning EIA Regs 2017	16.12.19
Vale of Aylesbury Local Plan	AVDC	Vale of Aylesbury Local Plan Main Modifications	17.12.19

Item 13 Date of Next and Future Meetings**Lead:** Chair of Planning Committee**Purpose or report:** To update on date of next and future meetings

- **Weds 4th March 2020**
- **Weds 15th July 2020**
- **Weds 18th November 2020.**