

PENN PARISH COUNCIL

Comment on the Chiltern and South Bucks Local Plan, Initial Consultation (Regulation 18)

9 March 2016

Option A (*making more efficient use of land*)

Given the demonstrated need for new housing Penn Parish Council (PPC) supports the more efficient use of land within existing built-up areas, such as by increasing building density, with one caveat. Off-street or underground parking is a vital part of successful development and should be a requirement of the planning process. It is noted that the current system of referring parking matters to Highways is unsatisfactory (eg Regius Court). We believe such decisions should lie within the Planning Officer's remit.

Residential parking standards appear inadequate, leading to roadside parking which causes increasing problems across the Parish. Too often garages are used for storage and cars are parked on the road. We suggest that planning approval should require provision of an adequate number of parking places, consistent with the number of bedrooms per property. Garages should be required to be used for parking. Basement development should be permitted for parking. We note that the NPPF allows Local Authorities to set their own car parking standards, which we would welcome.

The use of open space within urban areas for residential purposes is supported - although only if established activities, which take place on the open spaces, can be successfully transferred. The rural nature of the Penn Parish, its agricultural industry and associated pursuits need to be preserved, if the character of this AONB is to be maintained.

We believe that the key employment areas across the Parish should remain. PPC notes with concern the loss of a key employment area to residential use at Regius Court. We observe that planning policy appears ham-strung, if developers apply to convert a key employment area to housing using the Permitted Development Regulations. This requires urgent attention. We suggest planning approval for key employment areas should be conditional upon the site's designation being fixed for a minimum period. We suggest 25 years is a reasonable timeframe.

Option B (reviewing the purpose of ERASC)

We strongly support the purpose and function of Established Residential Areas of Special Character. Such designations have played a valuable role in preserving street scene at Knotty Green and Penn. As a result, we would be very loathe to see this diminished. The ERASC status is an important benchmark against which development can be judged. It is the view of PPC that ERASC is not 'anti-development', rather it promotes clarity, requiring the submission of sympathetic, considered plans.

Option C (extensions principle settlements eg. Beaconsfield)

Further development in Beaconsfield is dependent upon new infrastructure being adequately funded. We believe that infrastructure development is a vital component of successful planning and find it surprising that funding for key road improvements is not secured in advance. We believe that funds for large scale infrastructure projects should be secured from developers, in advance, if necessary from a Community Infrastructure Levy (CIL). Further that the burden of proof should lie

with the developer to show that existing infrastructure, including roads, medical services and schools, are of a quality and have the capacity to accommodate any development. This should be dealt with at the pre-planning application phase.

We would welcome a more pro-active infrastructure planning strategy, to manage the traffic flows through Beaconsfield. We urge the development of a relief road from the proposed 'Wilton Park' development to take traffic away from the town centre towards Amersham, including a new railway bridge.

School traffic is a particular concern causing 30-40 minute tailbacks along the B474 from Penn into Beaconsfield at peak periods. Further evidence of the problem is the 'rat-run' down Forty Green Road/Eghams Wood Road to avoid the Ledborough Lane turning. Withdrawal of subsidies for school transport has further exacerbated the morning and evening traffic. This seems short-sighted. A robust School Transport policy might be a quicker, cheaper and greener way to alleviate the problem than Planning. Otherwise, we suggest that Ledborough Lane be used to divert commuter traffic away from the old and new town centres, with a roundabout, or series of mini roundabouts, at each end, at the junctions with the B474 and A355.

We would prefer to see Beaconsfield retain a good mix of housing, not just expensive gated developments and luxury apartments. However the quality of multi-occupancy properties and their fit with the street scene will be vital. Planners must set the highest standards for any such developments. We would like to see permission for hedge-grubbing to replace with railings, locked gates, and private entrances refused, as these detract from our community. Finally, PPC note that car ownership in this affluent area is rising. The current standard for residential parking for new developments is wholly inadequate.

Option D (extensions principle settlements eg. Wycombe)

We acknowledge that extension to existing settlements makes sense in principle, although a number of the suggested areas are in other districts. In our view any expansion plans will require support from local residents. One important factor in gaining this, is to address infrastructure and capacity issue in advance of planning permission being granted. One example of the impact of development without sufficient attention to infrastructure is the A40 retail park at the bottom of Cock Lane and adjacent high density housing. PPC notes with concern that the Ashwells/Gomm valley development infrastructure is still unfunded. As a matter of policy, we believe granting planning 'approval in principle' hands strategic advantage to the developers, so is unlikely to deliver either the best commercial return, or funding for new infrastructure.

Option F (review of settlements within the Green Belt, notably Winchmore Hill)

We comment in detail in Appendix 1 on this proposal, as it impacts Winchmore Hill (Appendix 1, Response submitted to the earlier Local Area Plan proposals from CDC).

Option G (review of Green Belt boundaries)

We accept this proposal, which is discussed as it impacts our four key settlements in Appendix 1 (Response submitted to the earlier Local Area Plan proposals from CDC).

Option H (limited infilling within villages)

We support this proposal, which is discussed as it impacts our four key settlements in Appendix 1 (Response submitted to the earlier Local Area Plan proposals from CDC).

Option I (extensions to larger villages)

We do not support a blanket policy to expand one or two key settlements. Rather, that small scale developments (9-12 houses), judged on their merits, be added to appropriate settlements in line with local housing need.

PPC may propose more pockets of land for development, subject to consultation with local residents.

We note with concern the large preferred area identified in Holmer Green. We are most concerned about the impact on traffic flows through Penn Parish - notably along Gravelly Way, Penn Bottom, Common Wood Lane and Clay Street. Such roads remain essentially rural, used frequently by farm tractors, horse riders and recreational cyclists. Gravelly Way has no fewer than 4 riding stables, whose users must ride on the road to reach the permitted bridleways. We suggest that infrastructure improvements such as safe cycle/riding lanes, adjacent to these road must be introduced if this proposal is to go-ahead. Large volumes of traffic, plus riders/cyclists on the same busy roads, is a serious hazard.

We note with concern the increasing traffic on the A355 to Amersham, which is becoming dangerous due to the volume of traffic, also the A40 - another problem road.

Option J (growth areas close to train stations)

We prefer the option to extend settlements in the Green Belt which lie close to train stations, over schemes which lack a station. We note the importance of quick affordable train services to residents, a further attraction is their ability to reduce road traffic.

Option K (key employment sites)

We believe that Key Employment areas and Strategic Employment Areas should be retained where these already exist.

Affordable Housing

Penn Parish requires more modest affordable housing eg Paradigm at W/Hill. PPC notes that flat developments in Beaconsfield, Penn and Knotty Green are usually 'luxury' apartments, with prices, from £350-450,000, well beyond national average incomes.

Older Peoples Accommodation

Penn Parish requires more retirement housing. PPC note that the Penn School site would be an appropriate conversion, with sympathetic development, it could prove a valuable community housing resource and open spaces for the residents use.

Heritage

The Parish Council wishes to see the adoption of the Conservation Appraisal of Penn. Established policies such as CA, AONB and ERASC are most valuable and have led to considered, sympathetic development over many years.

Development Management Policies (listed in Appendix 7)

We agree with Sustainability Policies (S).

Infrastructure development should only proceed where essential infrastructure exists.

We particularly agree with Renewable and Low Carbon Energy standards and would support higher energy efficiency standards in line with common European standards.

We support Design Policy (D)

Development needs to be in keeping with the character of the surrounding area taking into account scale, density, form, height, landscaping, lighting and appearance of the street scene. We strongly support the use of the Chilterns AONB Design Guide.

We agree with the proposed policy for assessing Amenity.

We agree with basement development but suggest that the policy be extended to include provision of underground car parking - with the proviso that the basement must be used for car parking.

We support infilling within rows of development within the Green Belt.

We would like to see a policy to provide local guidance on extensions to dwellings and outbuildings in the Green Belt - consistent with the Chilterns AONB Design Guide.

Housing Policies (H)

We particularly support the requirement for a mix of house types and sizes which reflect local need.

We support a policy to include the amount of units, type and size of units or potential contribution, including a need for a proportion of care bed provision.

We particularly support the need for the Specialist Elderly Accommodation and suggest that this policy could be extended to encourage new build multi-generational housing, as is common in Germany (zweifamilienhaus).

We welcome the proposed policy on the creation of detached Annexes, to provide multi-generational housing, provided the Annex and house both share the same postal address.

We welcome Economic Development Policies (ED), particularly the protection for key employment sites against alternative use.

Historic Environment Policies (HE).

We agree with the policy aim to conserve and enhance designated historic assets and Conservation Areas. We are gratified to see the proposals to evidence Conservation Areas Appraisals and look forward to the early adoption of the Penn Conservation Area Appraisal.

Natural Environment Policies (NE)

We strongly support the key Chilterns AONB policy, to conserve and enhance the special landscape and setting of the AONB.

A policy to address works to Trees and Woodlands is essential, including TPO trees, those within Conservation areas, veteran trees and Ancient Woodlands.

Transport Policies (T)

We support the setting of sensible residential car parking standards by CDC within NPPF para 39.

Infrastructure Delivery

PPC support the introduction of a CIL. Further that any planning 'approval in principle' is granted only after infrastructure requirements have been defined and funding for them secured.

Local Green Space Designation

We suggest:-

- Common land held by PPC
- Village Greens/Commons - Penn, Penn Street, Winchmore Hill.
- Knotty Green Cricket Club
- Allotments at Knotty Green, Winchmore Hill, Penn Street and Beacon Hill

Appendix 1

Comments on the February 2014, Proposed changes to the Policies map arising from the Submission of the Delivery Development Plan,

We hereby re-submit for consideration as part of the new Joint Local Plan Consultation, our earlier comments.

Knotty Green

Maps 235, 236 237, 238. All existing Established residential Areas of Special Character (ERASC) to be deleted and replaced by *Areas of Little Change*. Nothing has been lost and small areas have been added, such as Alfriston School, our Recreation Ground, cricket pitch and grass triangle, and the red lion. A large new area has been added covering Eghams Wood Road, Hogback Wood Road and Woodlands Drive. **Agreed**

Penn

Maps 241, 242, 286. Existing ERASC along Elm Road/Church Road between Potters Cross and Beacon Hill is to be deleted and replaced by Area of Little Change. **Agreed**

Map 28. Pauls Hill Cottages are taken out of GB4 and put into washed over GB. **Agreed**

Map 59. Church and churchyard and The Knoll added to GB4. **Comment** - This is fairly pointless as there is only room for one house at the southernmost edge.

Map 159. Hazlemere Road to become a key employment site. **Agreed**

Penn Street

Map 55. The Forge & garden added to GB4. **Agreed**

Map 24. Chancellors Corner, School Road - GB4 deleted to become washed over GB. **Agreed**

Maps 113,137,160. Penn Street works - the newly-built part at the front to be a Strategic Employment Site and the older part to the rear to be a Key Employment Site. **Agreed**

Winchmore Hill

Map 8. The main village to come out of GB altogether, including the affordable houses and the transport depot off Coleshill Lane. This would allow development of the Securon site and one or two smaller ones. **Agreed** But **Object** PPC recommend that Areas of Little Changes be introduced, to protect the character of the older areas of the village, fronting the Common and The Hill.

Map 8. **Object** The area off our Common Track should not be added to GB4, as there is no space in which to build.

Map 8. **Object** The areas to the north of Fagnall Lane has been put in GB4, although there are no possible infill sites, if it not extended towards Fagnall Farm, as we suggested, to allow room for another house or two.

Map 19(c). **Object** The area fronting the Common to go into GB4, rather than washed-over GB, to allow for a house next to Pippins.

Map 30. The Wheilden Lane houses to be taken out of GB4 and put into washed over GB. **Agreed**