

Appeal Reference – APP/K0425/W/22/3296128

Land to the rear of 20 Wycombe Road, Holmer Green, High Wycombe

**Little Missenden Parish Council is pleased to have been granted Rule 6 status and would like to present their STATEMENT OF CASE**

### **Background**

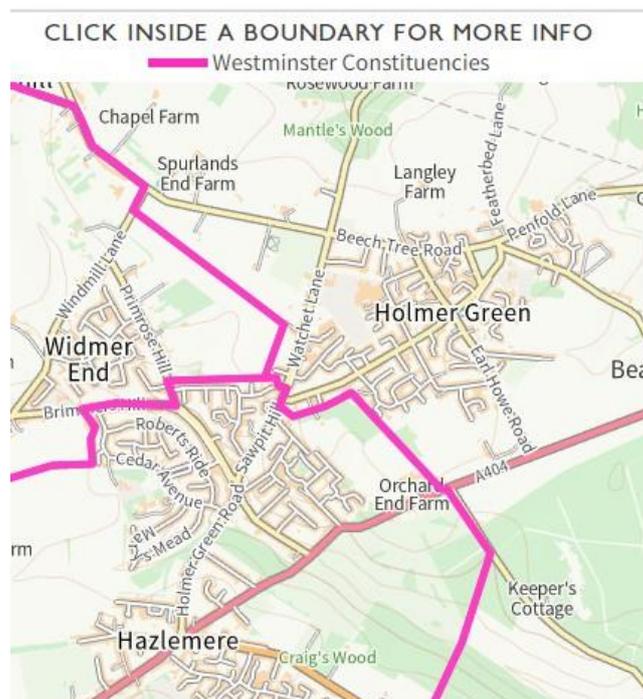
Little Missenden Parish Council represents 4 wards, one of which is Holmer Green.

Holmer Green is situated within Buckinghamshire, Chiltern Area. It is within Planning Area East, the Penn Wood and Old Amersham ward which is within the Parliamentary Constituency of Chesham and Amersham. It is classed as a village and has a population of approximately 4,080.

Within Holmer Green are a First School with 180 pupils, a Junior School with 240 pupils and a Senior School with 1,006 pupils.

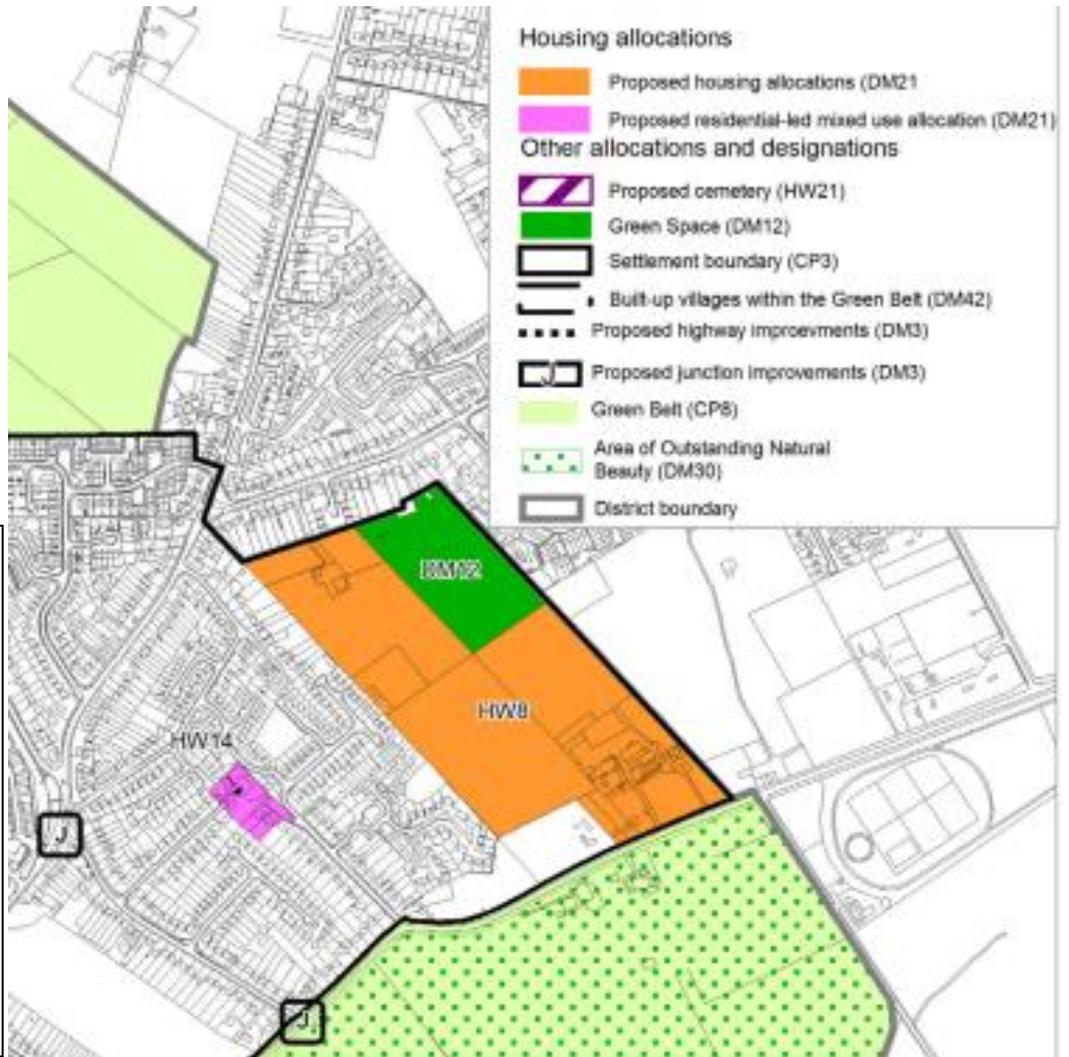
There is no GP surgery within Holmer Green. This closed in September 2018. Now residents attend GP surgeries within Hazlemere, High Wycombe, Hughenden and Old Amersham. The CCG have not revealed any plans to reinstate a local Primary Care facility.

### ELECTION MAPS



**Figure 1**

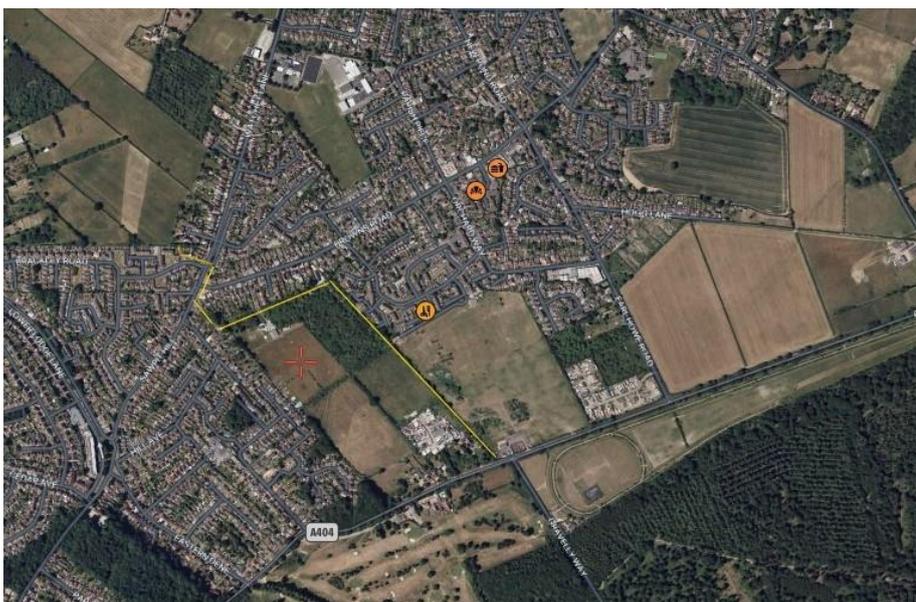
Illustration taken from <https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Reg-19-Publication-Local-Plan/Hazlemere-and-Cryers-Hill-Publication-Local-Plan-Map.pdf> showing the boundaries and relationship of HW8 to Holmer Green.



**Figure 2**

This aerial photograph shows Hazlemere to the left of the thin yellow line and Holmer Green to the right.

The thin yellow line is the Parish Boundary and illustrates where Holmer Green and Hazlemere abut.



## Our Case

- Little Missenden Parish Council objects to the planning application 18/07194/OUT and supports the decision of Buckinghamshire Council Strategic Sites Committee of February 2022 to defer, and then in May 2022 to be minded to refuse the application
- Little Missenden Parish Council will focus on three points
  - Coalescence and loss of separation
  - Requirement for Development Brief
  - Impact of proposed 20, Wycombe Road vehicular access upon Holmer Green

Little Missenden Parish Council would also wish to highlight inaccuracies within the Appellant's Full Statement of Case.

- Under 'The Appeal Site and its Surroundings'. Paragraph 2.7 solely describes Holmer Green. As stated within the document 'The Appeal Site is located at the northern part of the area allocated to deliver 350 dwellings by Policy HW8 of the Wycombe District Local Plan ("WDLP")'. Holmer Green does not come within the Wycombe District Plan. HW8 is within Hazlemere. Holmer Green is within the Chiltern Area.
- Within 2.7 there is reference to a doctor's surgery. Holmer Green has not had a surgery since September 2018.
- Little Missenden Parish Council were not consulted on this proposal and not informed of any public consultations. (Letter to Wycombe Planning Office from Little Missenden Parish Council ) dated 19<sup>th</sup> September 2018 on WDC Planning Portal)

## Coalescence and Loss of Separation

Policy HW8 states (5.1 High Wycombe Area. Wycombe District Local Plan – Adopted 2019)

### 1. Place-making

- a) Maintain a sense of separation between Hazlemere and Holmer Green, through the layout of the site.
- c) Provide a comprehensive development of the site within Wycombe District.

Little Missenden Parish Council believe that the creation of an access road between the HW8 site and Wycombe Road, Holmer Green causes complete loss of a sense of separation. Indeed 5.1.71 of the Wycombe Local Plan states 'Although the site in Wycombe District physically adjoins Hazlemere, the likely access points onto the site mean that residents are more likely to use the facilities in, and feel part of, Holmer Green'. This implies that the access points not only physically provide access into Holmer Green, as there is no direct access into Hazlemere, but also that the sense of belonging for residents will not be within Hazlemere but will be Holmer Green. This is despite their residences having been intended to be within Hazlemere and on land assigned within the Wycombe Local Plan.

This also raises the possibility of lack of local sense of community within HW8 itself. The plan submitted by the appellant does not engender the fostering of a common identity throughout the HW8 site due to the separate access route, and therefore no shared route for residents.

LMPC believe that access for the entire site should be from the A404, with 20, Wycombe Road providing the cycle and pedestrian access.

The requirement for new residential developments is that they encourage the use of public transport and other forms of transport. The bus route passes along Wycombe Road. Vehicle access is not required to use public transport. A separate cycle route, with no vehicles from the development and onto a local road is safer than exiting, with other vehicles, onto a busy A road.

### **The National Model Design Code Part 2 Guidance Notes 2021**

#### **M.1:ii Public Transport**

26. The distances that people are prepared to walk from their dwelling to reach public transport are determined by the nature and quality of the public transport service, how attractive and safe the walk feels, and the total length of their journey.

#### **M.2.i Walking and Cycling Routes**

34. For local journeys, this means creating continuous, clear, relatively direct and attractive walking and cycling routes both within a large site and into the surroundings.

### **The National Planning Policy Framework 2021 demands**

110. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- b) safe and suitable access to the site can be achieved for all users

A vehicle access from Tralee Farm into Holmer Green is not a requirement, or a necessary part of, the HW8 policy. ( Under **2. Transport** b and c HW8 Wycombe Local Plan)

Due to the position of HW8 it has the effect of infilling between Hazlemere and Holmer Green. Currently Hazlemere and Holmer Green buildings solely abut at 70 Sawpit Hill. The homes along Wycombe Road and those in Deanway, Holmer Green do abut Hazlemere Parish at land. However, this is currently undeveloped farmland. (See Figures 1 and 2)

This loss of separation and coalescence is further exacerbated by the Outline Plan (Figure 3) which relies upon the gardens of the Wycombe Road and Dean Way properties to form the green barrier.

The Figure 3 also shows the boundary of the HW8 site and 20, Wycombe Road outlined in red. The thin area to the left is the land of 20, Wycombe Road and not within HW8 or Hazlemere. It is within Holmer Green. The houses 6 – 18 Wycombe Road have no green boundary between the rear of their gardens and the proposed homes within the Tralee Farm site of HW8. Should an access be permitted through the site of 20, Wycombe Road then 22, Wycombe Road and 2, 4 and 6 Dean Way will directly abut the proposed access road.

The barrier between Tralee Farm and existing properties should not be gardens and should be within HW8.

**Figure 3**  
 Preliminary site plan from  
 Wycombe  
 Planning Portal  
 18/07194/OUT



Requirement for a Development Brief

Place-making within the Wycombe Local Plan, (Policy HW8 – Adopted 2019) advises **Provide a comprehensive development of the site within Wycombe District.**

Little Missenden Parish Council believes that a ‘comprehensive development’ indicates that the entire site has been designed to work together, not to be approached as ‘piece-meal’ developments. The Oxford dictionary defines **comprehensive** as an adjective meaning *including or dealing with all or nearly all elements or aspects of something.*

To achieve a comprehensive development then all aspects of HW8 need to work closely with each other. The site should flow and be inclusive. The authors of The Wycombe Local Plan believed that the heading this should be under was ‘Place-making’. LMPC believe that the intention was to foster a common identity by ensuring the residents of HW8 formed a community.

To allow Tralee Farm to access through Holmer Green, whilst the remainder of the site access from the A404, is to stray from ‘comprehensive’.

This then moves to the end of the paragraph ‘**within Wycombe District**’. Holmer Green is not within Wycombe District, Wycombe Road is not within Wycombe District. As previously identified it is within Chiltern District.

Therefore, a ‘comprehensive development of the site within Wycombe District’, as required by Policy HW8, has not been achieved.

[Wycombe District Local Plan \(Regulation 19\) Publication version Topic Paper 4: Transport](#) sets out concisely in 5.1.63 the requirement for ‘*A Comprehensive approach to the development of the land in Wycombe District is essential for good planning of this site. Preparation of development brief for the site will be essential to coordinate the detailed planning of the site and should be used to inform any planning application submitted for the the future development of site.*’

A comprehensive development would require all vehicular traffic access via one route. The updated plan for emergency access already provides for an emergency access road to the entire site from A404 and **Transport d)** states 'Provide or contribute to **off-site** highway improvements as required by the Highway Authority. The emergency access could be redesigned to ensure safe and suitable vehicular access to HW8.

### Impact upon Holmer Green

#### Policy CS25: DEALING WITH THE IMPACT OF NEW DEVELOPMENT ON THE TRANSPORT NETWORK

Development proposals shall be consistent with, and contribute to, the implementation of the agreed transport strategies and priorities set out in the Buckinghamshire Local Transport Plan 3 (2011-16). Chiltern District Council will work with Buckinghamshire County Council and other relevant agencies to:

- a. Where feasible, ensure that planned development in Chiltern District will not adversely impact the transport network.
- b. Assess the impact of development proposals on the transport network, including public transport, traffic flows, air quality, accessibility levels and road safety. Provision for any necessary improvements or mitigation measures to reduce any negative impacts must be secured prior to final occupation of the development.
- c. Identify and safeguard planned public transport, walking, cycling and road improvement lines from other development.

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#### Policy CS26: REQUIREMENTS OF NEW DEVELOPMENT

Development proposals will be expected to:

- a. Provide safe, convenient and attractive access on foot and by cycle, making suitable connections with existing footways, public footpaths, bridleways, restricted byways and cycle ways, local facilities and public transport so as to maximise opportunities to use these modes;
- b. Ensure that the convenient use and enjoyment of existing public rights of way, such as footpaths and bridleways and restricted byways, are not affected by development;
- c. Integrate with local public transport services and also where appropriate provide direct routes protected from traffic congestion, interchange, stops and waiting areas;
- d. Be appropriately located to the road network and provide satisfactory vehicular access(es) to and from the area of development so that the convenience, safety, and free flow of traffic using public highways (including pedestrians, riders and cyclists) are not adversely affected;
- e. Provide appropriate and effective vehicular and cycle parking and servicing arrangements;
- f. Ensure that all vehicular traffic generated by future development does not materially increase traffic problems, for example, congestion and local air quality, taking account of off-site improvements or contributions towards them which may be secured;
- g. Secure the preparation and implementation of measures which minimise and manage parking and travel demand, including as appropriate travel plans, parking management plans and car clubs;
- h. Ensure that developments will be served by adequate infrastructure capacity in terms of water supply, foul drainage, waste water and sewage treatment, high speed broadband access and other utilities, without leading to problems for existing users.

<https://www.chiltern.gov.uk/planning/adoptedcorestrategy>

LMPC use here the Chiltern District Local Plan, Core Strategy to illustrate their objections to vehicular access via 20, Wycombe Road, Holmer Green and also the factors required by Chiltern District for New Developments The rationale for using this is due to the fact that the traffic will discharge directly from the Tralee Farm portion of HW8, into Chiltern District, using an access formed by the proposed demolition of 20, Wycombe Road. Both of which are within Chiltern District.

C S25 states – Outlines that development proposals should reduce the impact of new development on the transport network. The discharge of vehicles from 101 properties, delivery vehicles, trade vehicles and visitors onto Wycombe Road will affect a junction between Wycombe Road/Watchet Lane/Sawpit Hill which was already, prior to the Senior School expansion, 'suffering from limited capacity'. (Report Strategic Sites Committee CC/0059/19 Page 8 [Development Control Committee \(moderngov.co.uk\)](http://www.moderngov.co.uk) )

Since previous assessments were conducted the Holmer Green Senior School expansion has completed and this has seen an increase of 300 more persons, pupils and staff, travelling to the school.

C S26 covers other aspects of new developments which are not addressed within Inland Homes Application CC/0059/19. Here, LMPC would highlight.

f) Ensure that all vehicular traffic generated by future development does not materially increase traffic problems, for example congestion and local air quality

The vehicles serving 101 new homes cannot fail to increase traffic problems, as previously commented upon.

Part of the approval for the expansion of Holmer Green Senior School was dependant upon the generation of a Travel Plan to limited the increased demands on local roads. This plan proposes a Park and Stride component where pupils will be dropped off at Park Parade (Cosy Corner). This parade of shops is situated at the bottom of Sawpit Hill, in Hazlemere. The estimate was that 17% of pupils would use this facility. The figure does not include those pupils who live in Hazlemere and already walk to school. Air quality for these pupils, other pedestrians, and current residents due to the increased congestion at the Wycombe Road/Sawpit Hill will, inevitably, be reduced.

h) Ensure that all developments will be served by adequate infrastructure capacity in terms of water supply, foul drainage, waste water and sewage treatment.....without leading to problems for **existing** users.

The appellant's response to concerns from Thames Water (21st July 2021) *As an allocated site Thames Water will have had to plan the necessary upgrade works to the existing foul water network following the adoption of the Wycombe District Local Plan ("WDLP") to accommodate the proposed development. We therefore object to the proposed foul water drainage condition as currently worded as there is a statutory duty to provide capacity.*

Affinity Water are responsible for the clean water provision. There are already identified problems with the domestic water supply to users within Holmer Green. Little Missenden Parish Council had a telephone discussion with Affinity Water (2021) as to what plans are currently in place for ensuring the supply should Tralee Farm been granted permission. They were informed that Inland Homes had contacted Affinity with a pre-development application in 2018. Unfortunately, the response to this has not been shared on the Planning Portal. LMPC understand that to service 101 homes an entire improvement project would be required to the current infrastructure under Wycombe Road. That this would require road closures and scheduled cut-offs estimated at being for 1 year.

Neither the foul drainage or water supply appear to be addressed adequately by either the Wycombe Local Plan or the Appellant.

## **IN SUMMARY**

Little Missenden Parish Council believe that the impact on Holmer Green has not been taken into account either by Policy HW8 or the Appellant. That there has been no requirement to take into account the impact on a separate village and, as a result, lack of separation and coalescence has been ignored and the effects on the highways underestimated.

There is a stated requirement for a Development Brief, this has not been produced.

Little Missenden Parish Council support Buckinghamshire Council in their rejection of this outline application