



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

Planning Committee

on 10.00 a.m. Wednesday 21st November 2018

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

Agenda

1. Apologies	10.00 – 10.01
2. Declarations of Interest	10.01 – 10.03
3. Minutes of Previous Meeting	10.03 – 10.06
4. Matters Arising	10.06 – 10.20
5. Public Question Time	10.20 – 10.30
6. AONB Management Plan – Latest consultation version	10.30 – 11.20
7. Affordable housing in AONB – Presentation and Discussion	11.20 – 12.00
8. Planning Application responses and updates	12.00 – 12.15
9. Development Plans responses and updates	12.15 – 12.25
10. Any urgent business	12.25 – 12.29
11. Date of Next and Future Meetings	12.29 – 12.30

Item 3 Minutes of Previous Meeting

Author: Lucy Murfett Planning Officer

Lead Organisations: Chilterns Conservation Board

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

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

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

Background

1. The draft minutes from the meeting on Wednesday 18th July 2018 are attached (at Appendix 1) for approval.

Recommendation

1. **That the Committee approves the minutes of its meeting which took place on 18th July 2018.**

Appendix 1



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

**held on Wednesday 18th July 2018 at The Chilterns Conservation Board office, 90
Station Road, Chinnor OX39 4HA10.05 AM**

BOARD MEMBERS PRESENT

Member	Appointing Body
Appointed by Local Authorities	
Cllr Lynn Lloyd	South Oxfordshire District Council
Cllr Hugh McCarthy	Wycombe District Council
Cllr Nick Rose	Chiltern District Council

Appointed by the Secretary of State	
Helen Tuffs	Secretary of State
Elizabeth Wilson	Secretary of State- Chair

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

Co-opted Members	
Chris Hannington	

Officers present-	
Lucy Murfett	CCB Planning Officer

And others	
Deirdre Hansen	Minute taker
John Nicholls	Board Member, observing

The Planning Officer welcomed all present.

332. Election of Chair

Elizabeth Wilson was proposed, seconded and unanimously elected to serve as Chair until the AGM in 2019.

333. Apologies for absence

Apologies were received from Cllr David Barnard, North Herts District Council, Colin Courtney, Secretary of State Appointee and Mike Stubbs, CCB Planning Advisor

334. Declarations of Interest

No declarations of interest were made

335. Minutes of the previous meeting

The minutes of the meeting held 7th March 2018 were approved as a true record and signed by the Chair.

336. Matters Arising from the minutes

There were no matters arising not on the agenda.

Public visits to the CCB website were briefly mentioned and it was suggested a link to the CCB's website on District Council websites would be useful. Local authority Board Members to investigate whether their websites have such links and if not suggest.

337. Public Question time

No members of the public were present.

338. AONB Management Plan-Draft Development Chapter.

The Planning Officer informed the Committee that the first draft version of the statutory Chilterns AONB Management Plan was published online for stakeholder consultation on 10th July 2018 with a response deadline of 28th August 2018, working towards publication of the final version in spring 2019.

The Planning Officer gave the Committee a summary of the work undertaken to date and the future timetable.

The Committee went through the first draft of the Development Chapter in detail, discussed it and gave their views. The Planning Officer noted the contributions and will circulate a redraft incorporating the comments.

10.30 Cllr Alison Balfour-Lynn arrived.

The Planning Officer thanked the Members for their contributions. She also thanked Chris Hannington for his valuable contributions to one of her recent responses on a planning application.

12.30 Chris Hannington left the meeting.

1. The Committee PROVIDED feedback through the workshop on the Development Chapter on the Chilterns AONB Management Plan.

339. Review of Position Statement on Cumulative impact of Development

The Planning Officer had issued a full report with the agenda of the meeting. There were no additions and she commented that it was too soon to review the impact of the new position statement.

12.37 Cllr Nick Rose left the meeting.

The meeting discussed the role of position statements, their utility and what more could be done. It was agreed that position statements provide detail and aid to the CCB, Local Authorities and others. It was agreed that they should be maintained, and more assistance should be sought for this work. It was highlighted that in view of the work on the Management Plan 2019 resources are stretched

and further work on position statements is unlikely to be undertaken until the publication of the Management Plan.

1. The Committee AGREED that it was not in a position yet to review the utility of the new Position Statement and AGREED that the Position statements are a useful tool for the CCB to add to once the AONB Management Plan Review is finished.

340. Development Plan Responses

The Planning Officer informed the Committee that she had submitted representations on 6 development plan documents, 3 infrastructure consultations and 1 national policy consultation. She commented that it is an important and busy time of year, resources are stretched a number of local plan examination hearings are in progress at which CCB will be represented. Luton Airport consultation events are underway, with the Planning Officer and some Board Members due to attend.

- 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.**

341. Planning Applications Update

The Planning Officer informed the Committee about and sought approval for, the 26 responses and 2 appeal representations that have been made by the Planning Advisor under delegated powers in connection with Planning Applications as detailed in the agenda.

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

- 4/00958/18MFA Site LA5 Icknield Way Tring
- 18/05926/FUL Old Rifle Range Farm, Great Kimble
- 17/07666/OUTEA OS parcels 8784 and 0006 Mill Lane, Monks Risborough and De Graven Meadows, Askett
- 18/05363/FUL Abbey Barn South, Abbey Barn Lane, High Wycombe
- CH/2019/0659/OA Land south west of Asheridge Road, Chesham
- P18/S1371/O Land at South Stoke Road, Woodcote

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

342. Urgent Business

- a. South Oxfordshire emerging Local Plan was mentioned. 15 sites are being reassessed by SODC. Concern was raised about Reading expanding into South Oxfordshire, the impact on the setting of the AONB and in the context of the CCB's request to Natural England in 2013 to review the boundary of the AONB.
- b. Dates for future meeting will be circulate

The Planning Officer was thanked for her work and the members thanked for their contributions.

Date of the next meeting Wednesday 21st November 2018 at CCB offices at 10.00 am.

The Chair.....

Date.....

Item 6 Draft AONB Management Plan – Development Chapter

Author: Lucy Murfett Planning Officer

Lead Organisations: Chilterns Conservation Board

Resources: Staff time, Planning Committee time

Summary: The second version of the statutory Chilterns AONB Management Plan was published for consultation on the webpage <https://www.chilternsaonb.org/management-plan-review> between 22nd October and 31st December 2018 (10 weeks). We are working towards publication of the final version in spring 2019. Views are welcome from Board members, stakeholders and the public.

Purpose of report: To update the Committee on responses to Version One and changes in Version Two, and to engage the Committee in shaping the final version of the development chapter of the AONB Management Plan.

Background

1. All AONB Management Plans must be reviewed every five years (Countryside and Rights of Way Act 2000 section 89). The current [Chilterns AONB Management Plan](#) covers the period 2014-2019 and the process of reviewing this plan is now well underway. The webpage <https://www.chilternsaonb.org/management-plan-review> holds all the information including the draft management plan, the online response form, summary of consultation so far, and screening reports for the habitat regulations assessment and strategic environmental assessment,
2. Initial events were held between November 2017 and March 2018 to gather evidence and views. For planning, this included:
 - a launch event for local authority senior officers, Natural England and DEFRA on 16th November 2017;
 - a Planning Forum workshop on 22nd February 2018 with planners and stakeholder from across the Chilterns AONB; and
 - a workshop at the last Chilterns Conservation Board Planning Committee meeting on 7th March 2018.
3. The first version, known as Draft One, was published on CCB's website for stakeholder feedback in July. Committee gave feedback on that version at Planning Committee of 18th July 2018. We received over 50 responses for organisations and individuals.

4. The main issues raised relating to planning were:

- Nearly all the members of the public who responded either expressed support for these policies or wanted them stronger eg. stop development/ stop HS2/ prevent inappropriate development/ change planning laws
- Some local authorities liked the approach, others wanted weaker policies or no policies in this section, because of compatibility with local plans
- Whether to support small-scale housebuilding in the AONB or restrict to small-scale affordable housing
- Suggestions made for extra subjects to cover eg what is major development, or projects eg HS2, Oxford-Cambridge expressway
- Add green infrastructure

5. Changes made to draft plan in response were:

- New policy wording on green infrastructure and net gain
- Added policy for major infrastructure proposals to avoid, mitigate and compensate to achieve a net gain for the AONB
- Added wording on Oxford-Cambridge expressway and HS2 design
- Added research on house price premium in the Chilterns AONB and adjusted policy wording on affordable housing
- Added advice on major development
- Explained that the setting of the AONB is not a geographic area that can be mapped
- Added wording on pressures faced by local authorities
- New policy wording on light pollution, no additional water abstraction from chalk streams, public transport

6. The draft second version was presented to the full Board on 17th October 2018 (see [Board papers](#) item 10). It was published for public and stakeholder consultation at the end of October with a response deadline is 31st December 2018. This is the main formal consultation on the draft Management Plan. An AONB Planning Forum meeting is scheduled to take place on 11th December to engage local authority planning officers, the statutory bodies and organisations with an interest in Chilterns planning.

7. The draft Management Plan contains material on planning throughout the document, and most importantly in the chapter on Development (chapter 10). This is reproduced in Appendix 2. Members are encouraged to give their views to help shape the final version.

Recommendation

1. **That the Committee provides feedback through the workshop on the Development chapter of Draft Two of the Chilterns AONB Management Plan.**
2. **That the Committee is encouraged to promote responses from local authorities, organisations and the public.**

Appendix 2

**Extract of the
Chilterns AONB Draft Management Plan
October 2018**

10. Development

Context

Areas of Outstanding Natural Beauty are outstanding landscapes whose distinctive character and natural beauty are so precious that it is in the nation's interest to safeguard them. Special planning controls apply in the AONB. The planning system protects AONBs in order to conserve and enhance the natural beauty of the area. Part of looking after the Chilterns for current and future generations involves limiting development¹ and making sure that anything that is built genuinely enhances the AONB. This is very difficult to do. In this chapter, we set out our policies to achieve it.

Whilst nationally there is a need for development, there is also a need to protect the most special places, the finest and most beautiful parts of the countryside. They must be kept special. This is particularly true for the Chilterns, an irreplaceable green lung for London and its commuter belt. The AONB is not a suitable location for general housing and economic development that does not need to be in the nationally protected landscape. In the AONB, different priorities apply: conservation and enhancement of landscape and scenic beauty, and the conservation of wildlife and cultural heritage. Planning policies and decisions for our area should encourage the Chilterns' role as a haven for wildlife, a place to experience history and enjoy the outdoors.

The Chilterns is a highly desirable area in which to live. It is commutable to London and closely surrounded by large settlements, many of which are planned to expand. For example, Aylesbury has been designated a Garden Town and will grow by at least 16,000 extra homes. Local authorities face pressures when preparing their Local Plans for settlements to expand into the AONB and its setting, for example at Luton, Princes Risborough, High Wycombe, Hemel Hempstead and Marlow, to name but a few. The vast scale of the Oxford to Cambridge growth corridor will change the strategic geography of the region forever, while making it ever more important that the Chilterns is protected to play its role in the health and wellbeing of that future population.

Pressures for development have increased significantly since the last AONB Management Plan was prepared. Recently, there has been a four-fold increase in the number of new homes granted planning permission each year in the Chilterns AONB². On top of windfall development on sites not anticipated in advance, Councils are themselves proposing significant housing allocations in the AONB in draft local plans and neighbourhood plans. There could be over 500 new homes built a year in the Chilterns AONB post 2020. This could result in the construction of 7,500 new homes in the nationally protected landscape of the Chilterns AONB by the mid-2030s. This will have serious impacts on its beauty, character, ecology and tranquillity. We also have HS2 being built through the Chilterns AONB and airport expansion proposed at Heathrow and Luton, which threaten more over-flying of the AONB.

Even small scale, cumulative changes to land and buildings can materially harm the natural beauty of the Chilterns AONB. Creeping suburbanisation is already diminishing the quality of the landscape, for instance when householders or businesses build unsympathetic extensions or install

¹ Town and Country Planning Act 1990 (Section 55) - "development," means the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.

² [Independent Review of Housing in England's AONBs](#) (2017) shows number of homes permitted in the Chilterns AONB rose from an average of 82 per year before 2012, to over 386 per year during 2015-17 (the 386 figure is an under-count because the 2015-17 figures exclude smaller sites of less than 10 units).

inappropriate fencing, gates, external lighting and domestic paraphernalia. If habitats continue to become smaller with their links severed by our transport corridors, noise barriers and security fencing, the AONB will be poorer. More overflying aircraft, roads used as rat-runs and light pollution at night will spoil the beauty and tranquillity of our area. The Chilterns will become less enjoyable to visit and less special.

[insert Photo & caption: Enjoying the Ridgeway National Trail. In parts of the Chilterns, there are stretches where you don't see a building for miles, this rare experience in the busy south-east is something to treasure and safeguard]

The Chilterns is becoming increasingly exclusive as a place to live. Research by Savills using Land Registry data show that house prices in the Chilterns AONB attract a premium of 75% above the average house price for the counties, and 162% higher house price than the UK average:

Area	Distinction	Average Second Hand Sale Price, 12 months to April 2018	5 Year Growth	Premium above County(s) average	Premium above UK average
Chilterns	AONB	£718,629	29%	75%	162%
Source: Savills Research using Land Registry					

Although many homes have been permitted in the AONB in recent years, very little of it has been affordable housing. Regrettably, there have been no Rural Exceptions Schemes³ in the Chilterns for several years. The stock of affordable homes has dwindled through the Right to Buy, and in some areas, by taking away restrictive covenants designed to prevent former council housing being re-sold later as holiday homes or second homes. Rural pubs, village shops and barns are being lost to residential conversion, while smaller homes and bungalows seem attractive propositions for redevelopment into luxury large replacement dwellings. Part of the cultural heritage of the Chilterns is lost when families with long local connections move away. Outdoor work in farming, forestry, conservation land management and tourism is typically low paid, making it hard to keep people with the skills the AONB needs. Too often agricultural occupancy conditions have been removed with ease, reducing the stock of tied accommodation that goes with a job. We need new approaches to make sure the right kind of housing is being built. It must be available and affordable for local people. Sensitively-designed conversions, infill, rural exceptions sites and community-led housing schemes in the villages of the AONB can benefit the AONB. They are best when of a small-scale and meet local needs.

We need stronger mechanisms to protect rural pubs, village shops, public transport and community buildings for communities and visitors.

³ Rural Exceptions Schemes are small sites used for affordable housing in perpetuity where sites would not normally be allowed for housing. They seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Cumulative impacts

It is important to assess the cumulative impact of development on the character of the AONB. A single planning proposal may affect only a small area of the AONB. However, a number of similar developments in the area, or continuous incremental changes over time, or a series of new developments in sequential views along an important trail, can have a significant impact. The combined effects of a set of developments can have a cumulative detrimental effect. The character of the AONB, its wildlife and people's enjoyment could slowly diminish over time. We have further advice in a [Position Statement on the Cumulative Impacts of Development on the Chilterns AONB](#).

[Photo & caption: Keep dark skies and stars bright: light pollution from inappropriate large glazed building design [or search on-line]

Photo caption: Classic Chilterns vernacular architecture at Turville: small-scale cottages of local brick and flint with clay tile roofs

Photo & caption: Award winning new Chilterns building at the Winery at Hundred Hills Vineyard, South Oxfordshire

Photo & caption: Poor 'anywhere' designs fail to keep the Chilterns special and distinctive (Chinnor).

Photo & caption: Grand new build projects can also be insensitive to the AONB. Stark, white, huge and angular this replacement dwelling, here viewed from the Chilterns cycleway, dominates the landscape in its siting and design.]

A summary of planning arrangements in the AONB

Planning authorities have a legal duty to have regard to conserving and enhancing the natural beauty of the AONB⁴. They also have the permissive power to take all such action they need to in order to accomplish this⁵. However, the national conversation about planning tends to put meeting housing numbers first. Sometimes the responsibility and power local authorities have towards the AONB is forgotten or sidelined. This results in approval of housing schemes within the AONB that do not align with the vision for the AONB, or government policy for the AONB, or demonstrate that the statutory duty towards the AONB has been met.

The Chilterns Conservation Board has no planning powers and does not make decisions on planning applications. The Conservation Board has an advisory role. We comment on emerging plans and major planning applications and we prepare guidance. The AONB is split across thirteen local authorities⁶, each with planning responsibilities. The Conservation Board brings together all those who make plans and determine planning

Prime Minister's Questions 10th January 2018:

Q: Will she confirm her commitment to protecting the Chilterns AONB as we pursue the Government's economic and housing development plans?

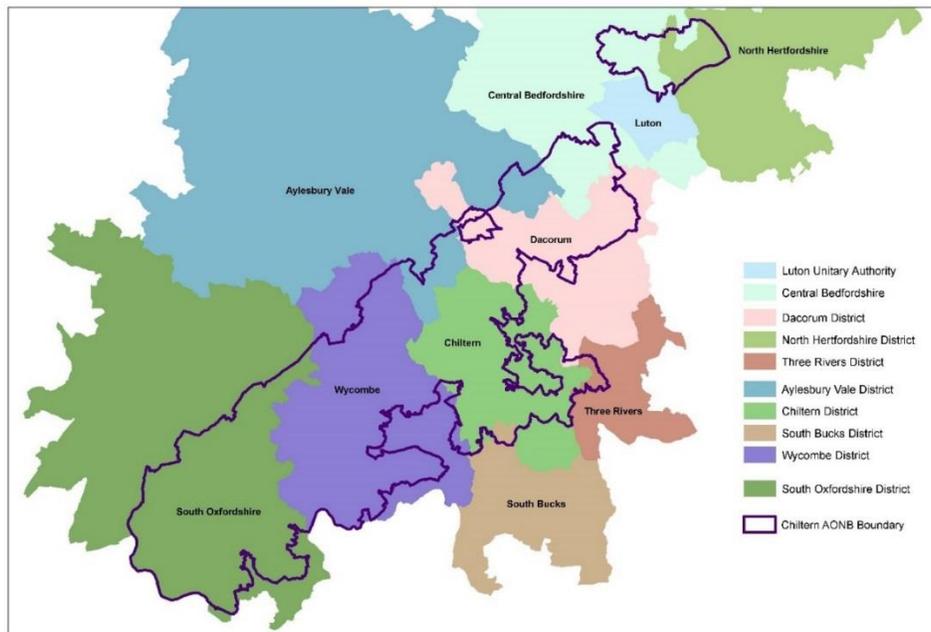
Prime Minister: "I assure her that we are committed to maintaining the strongest protections for AONBs and other designated landscapes. As regards the Chilterns AONB, I have to say to her that I enjoy walking in the Chilterns. I recognise the value of that particular environment, and we are committed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

⁴ The duty is set out in the [Countryside and Rights of Way Act 2000 section 85](#). The duty of regard towards conserving and enhancing the AONB applies to local planning authorities, parish councils, infrastructure providers, government bodies and others.

⁵ and the permissive power in [section 84](#)

⁶ 3 counties, 2 unitaries, 7 districts and 1 borough council. To find your local planning authority click [here](#)

applications in the Chilterns (see map below). We encourage cross-boundary thinking and co-operation. We would like a single consistent set of planning policies adopted across the AONB to ensure all planning decisions reflect its special qualities. This helps ensure that policies and decisions conserve and enhance the Chilterns for current and future generations.



Local Planning Authorities and the Chilterns AONB

When the CRoW Act 2000 Section 85 duty towards the AONB applies in planning:

In plan-making – for example when

- Setting vision, aims and objectives
- Preparing development management policies (not just those related to protected landscapes or the countryside)
- Generating options for development
- Developing reasonable alternatives
- Choosing site allocations
- Preparing site specific policies

In the development management process – for example when

- Having pre-application discussions with applicants
- Validating planning applications (is there the right information from the applicant)
- Scoping what supporting information is relevant
- Deciding whether a development is major development
- Deciding whether a development is EIA development
- Deciding whether full or outline permission is appropriate and whether or not to reserve matters such as landscaping, appearance, scale and layout
- Deciding whether to consult Natural England and the Chilterns Conservation Board and when taking their views into account
- Preparing a case officer's report

<ul style="list-style-type: none"> • Deciding whether or not to prepare or adopt Supplementary Planning Documents • When undertaking SEA⁷ • When engaging in Duty to Co-operate discussions with other authorities 	<ul style="list-style-type: none"> • Making a decision, by the Planning Committee or delegated, and when recording that decision • Deciding on conditions and obligations • Deciding whether or not to grant prior approval for some Permitted Development (PD) rights⁸ • Deciding whether to remove PD rights • Deciding whether or not to issue a lawful development certificate • Deciding whether or not to use planning enforcement functions, including to address authorised development and to secure delivery of conditions and obligations if they are not being adequately implemented.
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Scale of development

The purpose of designating an area of countryside as AONB is to conserve and enhance its natural beauty. An AONB must be treated differently from the wider countryside; it has the highest status of protection for its landscape and scenic beauty, equal to National Parks. Government policy is that great weight⁹ should be given to conserving and enhancing landscape and scenic beauty in AONBs. The conservation of wildlife and cultural heritage are important in AONBs. This requirement applies to all sizes of planning proposal, large and small.

The National Planning Policy Framework confirms that the presence of AONBs can restrict development in order to help achieve sustainable development¹⁰ and explains that the scale and extent of development within these designated areas should be limited¹¹. To this end, the Chilterns AONB should not be required to accommodate general housing and other development needs that arise from outside of the AONB.

Major development

Government policy requires that planning applications for major developments in AONBs should be refused “other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest”¹².

⁷ [Strategic Environmental Assessment \(SEA\)](#) is a process required by law of assessing the effects of certain plans and programmes on the environment

⁸ For see [GPDO](#) as amended

⁹ [National Planning Policy Framework](#) para 172

¹⁰ [National Planning Policy Framework](#) para 11 and footnote 6 make it clear that the requirement for local plans to meet objectively assessed needs does not apply in AONBs (for plan-making provide for objectively assessed needs for housing and other development unless ‘the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area’ with footnote 6 identifying AONBs as one such restriction.

¹¹ [National Planning Policy Framework](#) para 172

¹² [National Planning Policy Framework](#) para 172. Deciding whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purpose of conserving and enhancing the natural beauty of the AONB.

In determining what constitutes major development in the AONB, we recommend that decision makers consider whether the proposal, by reason of its nature, scale and setting, has the **potential** to have a significant adverse impact on the purpose of conserving and enhancing natural beauty. The potential for adverse impact will include the consideration of both the impact of cumulative development and the individual characteristics of each proposal and its context.

If a proposal is major, the decision maker will need to assess against the considerations in the NPPF para 172: “a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”. Major housing schemes are unlikely to be acceptable because the need could be met outside the Chilterns AONB, elsewhere in the housing market area. Similarly, for large economic development, energy and other major proposals. If it is considered that exceptional circumstances exist and development would be in the public interest, all opportunities to conserve and enhance the special qualities should be sought, by following policies GP1, and DP1 to DP15.

Permitted development rights

Many permitted development rights¹³ do not apply in AONBs. For example, the following need planning permission: larger homes extensions, exterior cladding or pebble-dashing a home, loft conversions involving additions to roofs, larger outbuildings, swimming pools, barn conversions to dwellings. This enables local planning authorities to manage the impacts of development on key elements of landscape character; and manage the details involved in minor developments, conversions and changes of use. This helps ensure the conservation and enhancement of the special qualities of the AONB.

The setting of the AONB

A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority’s legal duty towards the AONB¹⁴ applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). We have produced special advice in a [Position Statement on Development Affecting the Setting of the Chilterns AONB](#). The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary. Large proposals even far away can have an impact on the AONB, and so fall within the setting. We consider that the setting of the Chilterns AONB is the area within which development and land management proposals (by virtue of their nature, size, scale, siting, materials or design) may have an impact, either positive or negative, on the natural beauty and special qualities of the area.

[Photo & caption: **A View to a Hill**. This greenfield land at Alscot outside the AONB is in the setting of the AONB, because there is a clear view to the AONB at Whiteleaf Cross, and panoramic views back

¹³ These allow some types of development within certain thresholds without requiring planning permission, see [GPDO](#) as amended

¹⁴ in [Section 85 of the CRow Act](#)

from the public viewpoint on the top of Whiteleaf Hill. This field, and the view, will be lost to development under plans for a 2,500 home urban extension of Princes Risborough.

This “after” example from Chinnor (Former Garden Centre Site) shows how development can harm the view to the AONB. The edge of Chinnor is now very visible from the Thame Road, Emmington Road and the public footpaths in between. The density and the alignment with the houses tightly packed in a row, and lack of screening planting contribute to the negative effect on towards the escarpment.]

Applying planning policies in the AONB

The Conservation Board is not the planning authority for the Chilterns but is the statutory body for the AONB and can play a strong role in advising local planning authorities on both planning policy and planning applications. This AONB Management Plan is a material consideration in planning application decisions¹⁵ and planning weight can be appropriately attached. This AONB Management Plan should be considered when developing local plans and neighbourhood plans within or affecting the Chilterns AONB. The AONB Management Plan policies apply alongside government policy set out in the National Planning Policy Framework and policies in local authority development plans and community’s neighbourhood plans.

The effects of development on the Chilterns AONB are not just visual; it is not simply a landscape issue. Simply screening a development, or siting it on a plot to reduce visual harm, or cladding it with local materials, is not enough. The requirement is to conserve and enhance natural beauty, which means more than physical and visual aspects. Natural beauty includes the flora, fauna and geological and physiographical features of the AONB¹⁶. Natural Beauty covers everything that adds together to make the area distinctive, such as landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage and cultural heritage¹⁷ (see box in this Plan’s Introduction ‘what is natural beauty’). Impacts can be direct (e.g. loss of habitat by building on it) or indirect (e.g. development generating more traffic and harming air quality or tranquillity in the AONB).

Strategic Objectives

DO1	Ensure planning decisions put the conservation and enhancement of the AONB first.
DO2	Ensure that where development happens, it leaves the AONB better than it was before – richer in wildlife, quieter, darker at night, designed to have a low impact on the environment, and beautiful to look at and enjoy.
DO3	Embrace opportunities to restore natural beauty on sites currently degraded by unsympathetic development, infrastructure or dereliction.

Policies

To achieve these objectives we must work together to:

¹⁵ <https://www.gov.uk/guidance/natural-environment> see Paragraph: 004 Reference ID: 8-004-20140306

¹⁶ Defined in [section 92 of the Countryside and Rights of Way Act 2000](#) in a non-exhaustive list

¹⁷ List of the natural beauty criterion in Natural England’s [AONB Designation and Management](#) Guidance

O1 Conservation and enhancement

DP1	Ensure planning decisions take full account of the importance of conserving and enhancing the AONB and the weight given to its protection in the NPPF.
DP2	<p>Refuse development in the AONB unless:</p> <ul style="list-style-type: none"> • it is a use appropriate to its location, and • it is appropriate to local landscape character, and • it supports local distinctiveness, and • ecological and environmental impacts are acceptable, and • there is no additional water abstraction from the chalk aquifer or chalk streams, and • there is no harm to tranquillity through the generation of noise, motion and light that spoil quiet enjoyment or disturb wildlife, and • there are no negative cumulative effects when considered with other plans and proposals
DP3	Refuse planning permission for major development in the AONB unless there are exceptional circumstances and where there is a clear demonstration it is in the public interest.
DP4	In the setting of the AONB, take full account of whether proposals harm the AONB. In particular, avoid development of land visible in panoramic views from the Chilterns escarpment, or which generates traffic in or travelling across the AONB, or which increases water abstraction from chalk streams.
DP5	Require a Landscape and Visual Impact Assessment that meets the standards in the GLVIA ¹⁸ latest edition for all developments in the AONB or affecting its setting.
DP6	Support sustainable farming and forestry, nature conservation and facilities for visitors appropriate to the special qualities of the AONB.

O2 A better AONB

DP7	<p>Make sure that all development that is permitted in the AONB or its setting delivers a net gain for the Chilterns by</p> <ul style="list-style-type: none"> • on-site improvements for biodiversity, landscape, the rights of way network, AONB visitor facilities and/or
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¹⁸ Guidelines for Landscape and Visual Impact Assessment, produced by the Landscape Institute

	<ul style="list-style-type: none"> financial contributions, secured through s106¹⁹ or CIL²⁰, towards green infrastructure projects that enhance the AONB by meeting the aims of this AONB Management Plan.
DP8	Where a local community need is shown, support the development of well-designed, small-scale homes within villages that is affordable ²¹ for people who work within or have long-standing family connections to the Chilterns AONB.
DP9	Only support development that is of the highest standards of design that respects the natural beauty of the Chilterns, the traditional character of Chilterns vernacular buildings, and reinforces a sense of place and local distinctiveness. Require a Design and Access Statement to accompany every application, explaining how it complies with the Chilterns Buildings Design Guide.
DP10	Ensure that the design of HS2 complies with the Detailed Design Principles prepared by the AONB Review Group.
DP11	Keep skies dark at night by only using light where and when needed. All new lighting should be the minimum required and meet or exceed guidance ²² for the environmental zone it is in. For example, downward pointing, shielded, operated on timer, and with a 'warm white' colour temperature of 2700-Kelvin maximum. Avoid architectural designs that spill light out of large areas of glazing.
DP12	Support sympathetic proposals that enhance the Chilterns as a place to visit, explore and enjoy. Protect existing visitor and community facilities, such as rural pubs, public transport, B&Bs, youth hostels, village shops and cafes. Support sensitively designed new visitor facilities.

O3 Restore natural beauty

DP13	Support opportunities for enhancing the AONB by removing derelict or detracting developments and infrastructure.
DP14	Avoid new or upgraded infrastructure (roads ²³ , the expressway, 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.

¹⁹ Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken (under section 106 of the 1990 Town & Country Planning Act).

²⁰ The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure or support development.

²¹ Affordable housing is housing for eligible households whose needs are not met by the market.

²² Institute of Lighting Professionals (ILP) Guidance GN01:2011 [Guidance Notes for the Reduction of Obtrusive Light](#)

²³ See Environmental Guidelines for the Management of Highways in the Chilterns www.chilternsaonb.org/uploads/files/ConservationBoard/Environmental_Guidelines_Highways.pdf

DP15	Seek opportunities to remove or replace existing poor external lighting to restore dark skies at night.
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Key Actions

- 1) Work together to ensure all development plans covering the Chilterns conserve and enhance the AONB, for example by incorporating the [Chilterns AONB model policy](#)
- 2) Apply the CRoW Act 2000 [Section 85 duty](#) and refer to it when making decisions on planning proposals in or affecting the Chilterns AONB
- 3) Apply the advice in the [Chilterns Buildings Design Guide](#) to ensure high quality sympathetic development
- 4) Work together to develop AONB enhancement projects that can be funded by development through s106 contributions, CIL and funding packages to offset the impacts of major urban growth or infrastructure projects.

Item 7 **Affordable Housing in the Chilterns AONB**

Author: Lucy Murfett Planning Officer

Lead Organisations: Chilterns Conservation Board

Resources: Staff time

Summary: A presentation and discussion on affordable housing in the AONB.

Purpose of report: To update Committee about affordable housing in the AONB and seek steer on what CCB could do on this subject.

Background

1. At the last Planning Committee there was discussion under item 7 (AONB Management Plan) on the scope for small-scale housing in AONB villages and the extent to which such housing should be affordable. The session today will explore this further, starting with a summary of national policy, and a round up of approaches in other AONBs and National Parks.
2. An event was held on 25th September 2018 in Radnage Village Hall which Elizabeth Wilson attended for CCB. The subject was Community-Led Housing and it brought together speakers with experience of some new models of delivery being developed and trialled elsewhere. The presentations are available online at <http://www.communityfirstoxon.org/housing-community-planning/community-led-housing/>. One of the speakers, Fiona Mullins of Community First Oxfordshire will present to Committee today and answer questions.

Recommendations

1. **That the Committee provides feedback through the discussion on the need for, and feasibility of, initiatives to promote affordable housing in the Chilterns AONB.**

Item 8 **Planning Applications Update**

Author: Mike Stubbs Planning Advisor

Lead Organisations: Chilterns Conservation Board

Resources: Staff time

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

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

Background

3. News on the outcome of previous planning applications on which the Board has made representations is summarised in Appendix 3.
4. Since the last Planning Committee papers for the July 2018 meeting, the Board has made 37 formal representations on planning applications and 2 appeal representations. Of these 15 were objections, 2 were part objection/ part comments, 19 were comments and 1 was a support. The formal representations are summarised in Appendix 4.
5. Current live casework is listed in Appendix 5.

Recommendations

2. **That the Committee notes and approves the responses made in connection with the applications listed in Appendix 4.**

APPENDIX 3

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 (Stubbocks Walk), Brick Kiln Lane, Cockernhoe	NHDC	17/00830/1	Mixed use application for demolition of existing buildings and construction of 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
The Orchard, Bedford Road, Houghton Regis,	CBC	CB/17/0050 1/OUT	Outline: Demolition of existing buildings/structures and redevelopment of site to provide 21 dwellings, an estate road, landscaping and associated works	Granted 14.7.18	CCB Comments as previously reported	14.7.17
New Barn Farm, Cholsey	OCC	MW 0094.16	Extraction of sand and gravel with associated processing plant, conveyors, office and weighbridge, parking areas.	Pending	CCB Objection as previously noted	9.2.17
Land to the south of Newnham Manor, Crowmarsh Gifford Planning Application	SODC	P16/S3852/ FUL	Hybrid planning application for the erection of 100 new residential dwellings	Pending	CCB Qualified Objection as previously reported	23.6.18
Land off Crowell Road, Chinnor. Amended plans and additional documentation submitted 30th August 2017.	SODC	P17/S1867/FUL	Full planning application for residential development comprising 58 dwellings, new vehicular and pedestrian access, internal roads and footpaths, car parking, public open	Appeal against non-determination submitted 7.11.17	CCB Comments previously reported. Planning Appeal decision anticipated.	12.09.17

			space, landscaping, drainage and other associated infrastructure			
Land at Britwell Road Watlington	SODC	P17/S3231/O	(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 Previously reported.	25.10.17
OS Parcel 8784 & OS Parcel 0006 Mill Lane Monks Risborough And De Graven Meadows Askett Bucks	WDC	17/07666/O UT	Outline application (Including details of access) for the erection of up to 300 dwellings	Pending	CCB Comments Previously reported Further consultation 4.4.18 (amended details as reported in current applications)	30.10.17 Further consultation 4.4.18
Land at Wood Lane Woodcote	SODC	P17/S3701/O	Outline planning application for the erection of 23 residential dwellings (use class C3), vehicular access from Wood Lane,	Pending	CCB Objection Refused 28.09.18. Reason (2) <i>The development would extend the built-up limits of the settlement and would detract from the character and appearance of the site and this part of the Chilterns Area of Outstanding Natural Beauty.</i>	2.11.17
Peppard Road and Kiln Road Sonning Common	SODC	SODC reference - P16/S3630/O Planning Inspectorate appeals reference: APP/Q3115 /W/17/3185 997	Planning appeal against refusal of planning permission for residential development of up to 245 residential dwellings	Appeal in progress Inquiry for 1 st May 2018	Representations on behalf of the Chilterns Conservation Board Additional evidence was heard in late August 2018 and the planning appeal decision is anticipated.	3.1.18
Land at Kennylands Road Sonning Common	SODC	SODC reference - P16/S3142/O Planning Inspectorate appeals reference: App/Q3115 /W/17/3183 391	Planning appeal against refusal of planning permission for the erection of up to 95 dwellings	Appeal in progress Appeal dismissed 18 th July 2018 .	Representations on behalf of the Chilterns Conservation Board Impact on AONB setting being cited as a ground for objection in the Inspector's rationale for refusing planning permission.	22.12.17

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.	Pending	CCB Comments. CCB recommended various design amendments to improve the AONB setting relationship.	2.2.18
Land at Woodview Nurseries Wiggington Herts	DBC	4/03275/17/FUL	Change of use from nursery to residential redevelopment to provide four new dwellings.	Granted 1.10.18	CCB Holding Objection Design details and amendments were sought and amended plans submitted.	2.2.18
Century Park Luton	LBC	17/02300/EIA	Outline Consent for a business park comprising office space (Class B1), warehouse and industrial space and Full application for the construction of a 2km Century Park Access Road	Pending	CCB Holding Objection / Part comment Objection based on vehicular routing and cumulative impacts on the AONB, without necessary assurances in the application details.	21.1.18 ^t
New Relief Road, Beaconsfield, Bucks,	BCC	CC/0012/18	New relief road variation of CC/65/16 conditions 2 approved plans and 23 landscape mitigation	Granted 15.10.18	CCB Comments Comments related to cumulative impacts resulting in pressures to undertake road improvements outside the AONB.	23.2.18
Chiltern View Nurseries, Wendover Road, Stoke Mandeville	BCC	CM/0006/18	Operational development for introduction of concrete perimeter walls	Granted 23.8.18	CCB Comments as previously reported.	2.3.18
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.	1.6.18

22 & 24 Chapel Road & Land To The Rear Of 26 & 16 Chapel Road Flackwell Heath	WDC	18/05414/O UT	Outline application (all matters reserved except 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	Pending	CCB Comment as previously reported	27.3.18
Grundon Waste Management Ewelme	OCC	MW.0026/18	Erection of a welfare cabin for the site operatives (Retrospective application)	Granted 6.7.18	CCB Comments as previously reported	24.4.18
King George's Recreation Ground Coombe Lane Hughenden Valley Bucks	WDC	18/05905/F UL	Erection of community all-weather sport facility and removal of 3x floodlights to be replaced with 6x retractable floodlights.	Withdrawn 9.7.18	CCB Comments as previously reported.	18.5.18
Land at South Stoke Road Woodcote	SODC	P18/S1371/O	The erection of either up-to 80 dwellings (Class C3) or up-to 66 dwellings (Class C3) with assisted living accommodation	Refused 5.10.18	CCB Objection previously reported. <i>Reason (1) 'The application site lies beyond the edge of the settlement of Woodcote and is not a site allocated for housing within the Woodcote Neighbourhood Plan. The proposal would constitute a major development within the Chilterns Area of Outstanding Natural Beauty (AONB) and there are no exceptional circumstances that are in the public interest that would justify this major development within the AONB. The principle of the development is therefore unacceptable'.</i>	25.5.18
Site LA5, Icknield Way Tring	DBC	4/00958/18/MFA	Hybrid planning application for 240 dwellings, cemetery car park with toilet block and public open space	Pending	CCB Objection previously reported / amendments supported. Amendments were submitted (August 2018) and supported: (a) Additional details to reduce / prevent lighting 'glare'. (b) New planting to the western boundary and a redesign of layout here. (c) CCB recommended that the cemetery extension	22.5.18

					element is further enhanced by promoting design concepts derived from natural burial grounds within the UK for example with the design of woodland or wildflower meadows, and without headstones, tarmac drives and formal features. (e.g. as designed at Chesham Bois).	
Old Rifle Range Farm, Risborough Road, Great Kimble, Bucks	WDC	18/05926/F UL	Demolition of commercial buildings and erection of 10 x market dwellings (6 x 3 bed and 4 x 4 bed) and 5 x 2 bed affordable dwellings	Pending	CCB Objection as previously reported	21.5.18
Land Lower Icknield Way Chinnor. Development of 79a - 83	SODC	P18/S1004/ O	60 dwellings, with associated open space, landscaping, vehicular access and footpath links.	Pending	CCB Comment as previously reported	20.4.18
Land at Crowell Road, Chinnor,	PINS APP/Q31 15/W/17/3 188694	PINS APP/Q3115 /W/17/3188 694 SODC P17/S1867/ FUL	Full planning application for residential development comprising 54 no. dwellings, new vehicular and pedestrian access, internal roads and footpaths, car parking, public open space, landscaping, drainage and other associated infrastructure	Inquiry begins 26.6.18 Decision pending	CCB Comments as previously reported (Amended plans and additional details 30 August 2017).	29.5.18
White House Farm Cryers Hill Lane Cryers Hill Bucks	WDC	17/08051/F UL	Demolition of existing dwellinghouse and construction of replacement detached dwellinghouse	Pending	CCB Comments as previously reported	27.3.18
Abbey Barn Lane- Abbey Barn South Reserve Site Abbey Barn Lane High Wycombe Bucks	WDC	18/05363/F UL	A hybrid planning application seeking outline consent for up to 550 residential dwellings (with a minimum of 520 dwellings); up to an 120 apartment Extra Care and medical	Pending	CCB Comments as previously reported	27.3.18

Land at Beechwood Lane Wendover Bucks	AVDC	18/01506/A PP	Erection of one dwelling	Refused 23.6.18	CCB Objection <i>Reason (1) The proposal if implemented would result in the intrusion of built development on a site in the countryside located outside the established built-up area of Wendover, a site that forms part of the area designated an Area Of Outstanding Natural Beauty in recognition of its exceptional landscape quality. The proposed dwelling would be an intrusive and alien intrusion into the rural setting that would fail to conserve or enhance the natural environment, or the landscape and scenic beauty of the AONB. The proposal therefore fails to accord with AVDLP policy GP35 and fails to accord with core planning principles set out in the NPPF.</i>	30.5.18
Land to the east of Benson Lane Crowmarsh	SODC	P18/S0827/O	Outline planning application for up to 150	Pending	CCB Comment as previously reported.	12.5.18
Land South of R Thames and W of Gatehampton Viaduct	West Berkshire	17/03203/F UL	Safari tents	Pending	CCB Objection as previously reported	22.3.18
Gaddesden Home Farm	DBC	4/00870/18/MFA	Change of use to mass participation event	Withdrawn 1.8.19	CCB Objection	11.5.18
Land South West Of Asheridge Road Chesham	CDC	CH/2018/0 659/OA	Outline application for the development of site to provide up to 99 dwellings	Pending	CCB Objection as previously reported	5.6.18
The Hoo, Ledgemore Lane, Great Gaddesden, Hemel Hempstead	PINS & DBC	APP/A1910 /C/17/3192 327 and 4/0332 9/17/ENA	Roadway and earth bund	Enf Notice Upheld (appeal dismissed 29.10.18)	CCB made representations on this enforcement appeal by written reps, dealing with AONB duties but deemed out of time. The Inspector concluded that, Paragraph 34. <i>'The track cuts across these fields and into the parkland area. Given the substantial area of ground coverage of the wide track and the turning area, I consider that the development has a highly urbanising effect which contrasts harshly with the</i>	2.7.18

					<i>otherwise distinctive landscape character and parkland setting I have described. It thereby results in significant harm to the character and appearance of the area, the scenic beauty of the AONB, and the setting of the listed building'</i>	
Chinnor Hill Kennels	SODC	P18/S1674/O	Redevelopment for 5 dwellings	Pending	CCB Comments as previously reported	21.6.18
Gurdons Farm Oxford Road Stokenchurch Bucks	WDC	18/06124/FUL	Manege and separate lunging ring with surrounding post and rail fence & gate	Granted 5.7.18	CCB Comment as previously reported	2.7.18
Hudnall Park, Little Gaddesden, Herts	HCC	PL\0920\18	Camping area in association with YC Hertfordshire	Withdrawn 9.7.18	CCB Comment as previously reported	2.7.18
Part of OS Field 5828 Amersham Road, Coleshill Bucks	CDC	CH/2018/0573/FA	Erection of temp agricultural workers dwelling and agricultural building	Pending	CCB Objection as previously reported	4.7.18
White Lion Public House, St Leonards Bucks	CDC	CH/2018/0810/FA	Pub extension	Granted 31.7.18	CCB Support as previously reported	4.7.18
Land south east of Doveleat Chinnor	SODC	APP/Q3115/W/18/3201940 and P17/S2324/O	51 dwellings (outline)	Appeal withdrawn 7.11.18 and public inquiry cancelled	CCB Objection as previously reported	21.5.18

APPENDIX 4

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
OS Parcel 2814 opp Tiles Farm Asheridge Rd Chesham (Bramley Apple Paddocks)	PINS	CH/2017/164 8/FA & APP/X0415/C/1 7/3/3190005	Caravan site		CCB Written Representation Looking at the high level of protection afforded to an AONB within the Development Plan and in the National Planning Policy Framework at its paragraph 115 as well as in the Countryside and Rights of Way Act at its section 85, this application cannot be deemed to conserve nor enhance the landscape. We could not find any visual appraisal in the submitted papers but draw this conclusion on the basis of landscape character and the immediate topography around the application site. Development here is harmful to the special qualities of the AONB. In arriving at this conclusion we have considered the case as put by the appellant's agent with regards to AONB policy at paragraphs 5.8 and 5.9 of the statement of case.	16.7.18
The Pavilion, Thames Road, Goring	SODC	P18/S1983/F UL	Replacement dwelling and boathouse	Pending	CCB Comments CCB sought amendments to recommend a reduction in the scale of development along the river frontage. Subsequently amended plans delivered these suggestions.	12.7.18
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		CCB Comment / Part Objection (based on Local Plan due process) CCB would make the point here that the Local Plan process needs to run its course. The supporting planning statement justifies submission ahead of the Local Plan determination on the grounds of demonstrating	25.9.18

					<p>deliverability of the site within the tests set out in the NPPF. This alone would not be a reason to determine ahead of the Local Plan outcome. We have outstanding points as regards site HW 8 and the Inspector's recommendations following the examination in public should be allowed to run its course.</p> <p>Comments have been made against WDC site policy HW8 that would need to be taken into account in any determination of the application.</p> <p>CCB would submit two key points as: (1) That the applicant's LVIA deals with a newly planted orchard in mitigation of impact (its 5.2) but we consider that the Local Plan must be allowed to run its course before any determination can be made. If that is not to be the case we would ask that weight is given to our proposed policy amendments as set out below. (2) The mitigation proposed in the LVIA does not include mitigation of additional recreational pressures, as was countenanced in the EIA screening undertaken by the Local Planning Authority.</p>	
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		<p>CCB Objection</p> <p>(1) The development, notwithstanding the attempt in the June 2018 amendments to retrench the developed area and soften impacts, would be harmful to the views out from within the AONB and sufficiently so to harm the special qualities of the AONB by eroding the visual setting and associated landscape character relationship. (2) That the existing views from public vantage points would be harmed by the</p>	16.7.18

			<p>received 20 September 2016, 27 October 2016, 24 August 2017 and 13 June 2018).</p> <p>.</p> <p>:</p>		<p>apparent linear pattern of development, discordant with the largely nucleated pattern of Watlington – Pyrton along its historic spring-line morphology.</p> <p>(3) Development as proposed would also inevitably exert an impact though the use of lighting, to the detriment of the wider setting of rural open land beyond the AONB boundary sharing a similar semi enclosed rolling downland landscape character. The landscape outside the AONB is a valued landscape and the tests in NPPF 109 will also apply to this application. CCB is grateful for the opportunity to submit these comments.</p>	
<p>Upper Little London Farm Little London Wendover Buckinghamshire HP22 6QQ</p>	<p>AVDC</p>	<p>17/00148/AOP (amended landscape assessment documentation submitted June 2018).</p>	<p>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 and details of alterations to existing access only with all other matters reserved</p> <p>AVDC reference CCB Comments (previous objections raised).</p> <p>24th July 2018</p>	<p>Pending</p>	<p>CCB Comments (original CCB Objection 10th April 2017 as previously reported).</p> <p>CCB has been consulted on the amended details, comprising a landscape and character assessment report. We have assumed that this landscape and character assessment is in response to our earlier comments in objection (10th April 2017) and sets out to assess the impact on this sensitive part of the AONB, a nationally protected landscape. This additional detail is welcome, albeit that the submitted report is not a landscape and visual impact assessment consistent with the 'Guidelines for Landscape & Visual Impact Assessment', produced jointly by the Institute of Environmental Assessment and the Landscape Institute (GLVIA 3rd edition 2013) nor a report prepared under the auspices of the 'Landscape Character Assessment, Guidance for England and Scotland, 2002'. Both documents promote a methodology based around an assessment and evaluation of</p>	<p>24.7.18</p>

					<p>landscape character and visual impacts</p> <p>Whilst this application has potential to bring positive changes by developing degraded land we do consider that much remains to be resolved in the assessment of impacts and the need for close control over design and layout matters. To permit 10 dwellings imposes an expectation of development. It would be preferable instead to consider the principle of residential development (subject to the various caveats above) and not to determine such details until further evidence base and assurances can be delivered.</p>	
Land at Eyres Close Ewelme OX10 6LA	SODC	P18/S1514/F U	Erection of 3 dwellings	Refused	<p>CCB Comments</p> <p>The site benefits from a strong landscape element with the potential to create a strong hedge line above the bank feature. The need to enhance the AONB and be aware of its contextual setting lends itself to a detailed consideration of landscaping here and the need for a suitable condition and layout plan but also an acknowledged enhancement of that relationship.</p>	13.7.18
Kitcheners Field, Castle Hill, Berkhamsted,	DBC	4/01663/18/F UL	Light external drive and parking area	Pending	<p>CCB Objection</p> <p>Intrusive lighting harmful to landscape character and without justification.</p> <p>The reliance on a safety arguments for sporting use in the winter months could be a matter of management practice without the need for such lighting in the AONB. The applicant is also seeking to light the playing surface as well and a planning condition to restrict the hours of use which would be difficult to enforce. Either way there would be resulting harm to the AONB.</p>	26.7.18

Land to the Rear of Cleeve Cottages Icknield Road Goring-on-Thames	SODC	P18/S2308/R M	Approval for reserved matters (layout, appearance, landscape and scale) pursuant to outline application P16/S3001/O for the erection of up to ten dwellings with associated parking and amenity space.	Granted 6.9.18	<p>CCB Comments</p> <p>(a) The proposed brick of red, orange and a slight purple bricks. In the south-west of the Chilterns the traditional brick hue is orange – orange brown which reflects the isolated deposits of Eocene Reading Beds. We recommend an appropriate mortar mix as well. (b) The Chilterns Design Guide also recommends that 'Colour banding should use variations of red brick – avoid other colours' and that 'Paint is usually the most appropriate finish for timber windows: staining is not a traditional finish and should not normally be used'. (c) The landscape plan shows the landscaped and undeveloped eastern boundary of the site, which links to the wider AONB landscape. This area will need to be managed for biodiversity gain as is consistent with guidance in the National Planning Policy Framework paragraph 170.</p>	6.8.18
Great Kimble Church Of England School Church Lane Great Kimble	BCC	CC/0121/17	Application for the approval of details pertaining to condition 3 (Archaeology), 4 (Arboricultural Method Statement), 6 (Construction Traffic Management Plan) and 8 (Facing Bricks)		<p>CCB Support</p> <p>The materials condition (8) is the most pertinent to our duties and purpose. CCB is able to support the choice of materials and would also confirm that the loosely knapped flint details to elevations and window reveals constitutes an appropriate design approach as we discourage flint panels in such matters. This approach is consistent with the Chilterns Buildings Design Guide Chilterns Flint Supplementary Technical Note.</p>	27.7.18
Corner Barn Church Farm Station Road Aldbury Tring	DBC	4/01348/18/F UL	Change of use from light industry / storage to café.		<p>CCB Comments</p> <p>Generally supportive in that the AONB Management Plan is a material consideration, as confirmed in Planning Practice Guidance. This fundamental point is made by the AONB Management Plan at its Policy</p>	16.7.18

					<p>D1 which states that, D1 – <i>'The natural beauty of the Chilterns AONB should be conserved and enhanced by encouraging the highest design standards, reinforcing local distinctiveness and respecting the landscape, settlement character and special qualities of the AONB'</i>. Section Two on understanding and enjoyment deals with associated facilities and services at UE9 where it states <i>'The quality of welcome given to visitors, including the development of new facilities and services where appropriate, should be enhanced'</i>. The principle of the use here would satisfy this duty.</p>	
Gurdons Farm Oxford Road Stokenchurch	WDC	18/06124/FUL	Construction of a manege and separate lunging ring with surrounding post and rail fence		<p>CCB Comments</p> <p>We could not find any landscape appraisal or commentary in the papers nor any design and access statement. CCB would ask that the LPA is satisfied that the manege location is as close as possible to the existing cluster of buildings as improved under the 2010 permission and themselves near to the access track also created under that permission. Mitigation of any impact would require that the location has the least impact upon the wider landscape and this would be an important starting point. Also that a condition is imposed (similar to that attached to the consent under 09/07153/FUL) that there will be no floodlighting permitted here due to the sensitivity of the landscape and the proximity of the nearby public right of way. The design treatment would need to look as inoffensive and indeed as natural as is possible.</p>	2.7.18

Crowell Hill Farm Crowell Hill, nr Chinnor	SODC	P18/S2682/O	Outline application incorporating access details for demolition of existing industrial (B2) buildings. Removal of concrete hardstanding and erection of 5 detached dwellings		<p>CCB Objection</p> <p>This is an isolated rural location. The site is on the top of the Chilterns escarpment in a wooded area, with the strong character of the Chilterns and its special qualities. It is a deeply rural location in a nationally protected landscape; it is not a residential area and is not in a settlement. It is accessed along narrow winding roads from both the Chinnor and Radnage directions. It is an unsuitable location for new housing in policy and practical terms.</p> <p>Objection based on :</p> <p>(1) Lack of sufficient biodiversity enhancement. Any new scheme must be led by biodiversity / habitat green-space enhancement. The avoidance of domestic gardens and the promotion of habitat enhancement around the SAC/SSSI must be positively promoted and fewer dwellings proposed in a 'nestled' Chilterns barn / courtyard layout and vernacular.</p> <p>(2) The need for a a design approach that draws upon the rural Chilterns context and surroundings. That design approach will be directly influenced by the number of dwellings proposed.</p> <p>(3) There is an opportunity to wrap nature around the site with a large natural swathe south, which will also be of benefit by completely screening views of the site from the southern footpath. Ecological survey work should look closely at the green lawn area with trees south of the current works office to determine its species diversity (eg presence of chalk grassland species) to inform the habitat proposals and determine whether the site is best as woodland or</p>	16.10.18
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					grassland, or a mosaic of both.	
Hernes Estate Rotherfield Greys	SODC	P18/S1338/F UL	Free standing 11kW solar PV installation at the SODC reference 20th August 2018	Granted 26.9.18	CCB Comments CCB recommends that to ensure the least impact, that the location is as close to the existing complex of farm buildings as is reasonably practical. Further and to mitigate visual impact CCB recommends that the ground mounted system is suitably painted to blend into the background landscape. This can also be appropriately controlled by planning condition.	20.8.18
Hudnall Park, Little Gaddesden, Hertfordshire,	HCC	PL/0920/18	Proposed application for use of land within Hudnall Park as a camping area in association with YC Hertfordshire involving the erection of up to 18 tents for a fixed period annually at HCC reference	Withdrawn 19.7.18	CCB Comments CCB has reviewed the location and details contained in the submitted Design and Access Statement. The location does not result in any wider impact upon landscape views. The Design and Access Statement confirms that there would be a negligible visual impact and that the tent location would not be visible beyond the confines of the Park. The site also benefits from wider screening to its boundaries, which offers further enclosure and mitigation of any impact.	2.7.18
Land at Britwell Road Watlington	SODC	P17/S3231/O	- (1) Full planning permission for the demolition of the existing pig farm and its associated buildings; the		CCB Comments (supplementary) following previous objection In light of the now approved Neighbourhood Plan considerable weight must be given to the conservation and	28.8.18

			erection of 183 dwellings (Use Class C3); the realignment of Britwell Road and the creation of a new vehicular access; the creation of a vehicular access from the industrial estate road south of Cuxham Road; public open space; sustainable urban drainage system; landscaping; and other ancillary works, including off-site highway works; and the relocation of a telecommunications mast and equipment; and (2) Outline permission for up to 650sqm of Use Class B1a floorspace with access and all other matters reserved.		enhancement of the AONB as set out in Policy P5 as alongside CSEN 1 (ii) (as previously dealt with) and in the NPPF 170 and CROW section 85. The jump above the quantum of development anticipated for Site A is a material point in the determination here. Notwithstanding attention to design and layout in the revisions made and in absence of visualisation photomontages, CCB still seeks adherence to the recently approved Neighbourhood Plan policy in pursuit of an appropriate settings relationship of minimal impact. The alignment of development could, therefore, be pulled further into the site and materially increase the western / south-western open buffer and planted area. Should the new road progress it would be more shielded within that area, for the wider benefit of the urban / rural hinterland and visual impact from elevated ground at Watlington Hill (photo location 5 in the landscape and visual impact assessment).	
Land to the rear of 44 Kennylands Road Sonning Common	SODC	P18/S2631/FUL	Erection of 25 dwellings together with associated landscaping, and public open space on		CCB Comments In the current application the landscaping to the western boundary (as abuts the AONB) is to be found in the Landscape and Visual Impact Assessment (LVIA) at its plan KR003 and this shows an existing native hedge together with a supplementary screening belt. The supporting planning statement at its paragraph 3.18 acknowledges that the setting of the AONB is a material matter and explains in background as to why the original 15 metre buffer was changed to a 5 metre one. CCB concludes here that suitable conditions can ensure the delivery and maintenance	23.8.18

					of the buffer and also recommends consideration of some native tree species within the finally approved scheme such as Field Maple (<i>Acer campestre</i>) and that the supplementary screening is also native to the Chilterns, for example Box (<i>Buxus sempervirens</i>) or Hazel (<i>Corylus avellana</i>), as deemed appropriate	
North Barn Chaucer Court Ewelme		P18/S2451/F UL	Erection of a new detached single storey dwelling at SODC reference: 14th August 2018		<p>CCB Comment</p> <p>In this case the application represents an extension of development beyond the existing settlement pattern and into the wider AONB landscape. A judgement has to be made as to the landscape character and visual impacts that follow. From our reading of the application papers and the pre-application opinion released by South Oxfordshire DC, we would consider the conclusions drawn in the pre-application on AONB matters to be entirely reasonable and not at all subjective (as is asserted in the submitted design and access statement). Development within an AONB must, rightly, satisfy a number of high policy and legal tests. Whilst the design here is of a high internal environmental standard that must be considered after the planning principle is established. The pre-application opinion expresses concern here to protect the AONB.</p>	14.8.18
Land Between Longwick Road & Mill Lane Princes Risborough Buckinghamsh ire		18/06916/OU TEA	Outline application (including details of access only, with all other matters reserved) for the erection of up to 360 dwellings, provision of land for a primary school, public open space,		<p>CCB Objection</p> <p>This proposal falls within the setting of the Chilterns Area of Outstanding Natural Beauty. This impact is appreciated from views outwards as well as views as views towards the escarpment and generates the need for mitigation to conserve and enhance the Chilterns, and address the understandably increased</p>	

			landscaping, sustainable drainage system and vehicle, pedestrian and cycle access points from Longwick Road and Mill Lane.		number of visitors to it arising from the expansion of Princes Risborough. CCB has made a series of Local Plan representations, calling for deletion and/or amendment of various policies that affect the Princes Risborough strategic growth allocation. With this application submitted in parallel with the examination-in-public, CCB would request that the application is determined after the Inspector has reported on the Local Plan	
Land Adjacent To Ridgeside Stables Penn Road Hazlemere Buckinghamshire	WDC	18/06887/OUT	Outline application (including details of access) for construction of up to 90 dwellings with all other matters reserved.		<p>CCB Objection</p> <p>The application is within a sensitive location within a nationally protected landscape and is also metropolitan green belt. This site has been discounted by the Local Planning Authority when previously considering site selection ahead of the current Local Plan process. CCB would ask that this application be refused because it is harmful to the natural beauty of the AONB. This harmful impact would be immediately apparent from roadside views and from the nearby public right of way.</p> <p>CCB would argue that landscape character is the starting point and it is evident that the application land contributes markedly to the natural beauty of the AONB area and the special qualities of the AONB at this point, due to its geographical features. The special qualities here include the fact that the landscape character to the north of Penn Road is distinctive rolling farmland and the woodland is appreciated within that framework.</p>	7.9.18

Rumbolds Pit, Eyres Lane, Ewelme, Wallingford	OCC	MW.0088/18	Change of use for the storage of recycled material on land to the south of the primary working area. In addition to storage of recycled materials it is proposed to store empty waste skips in the ancillary area – details submitted pursuant to condition 4 of MW.0098/17 regarding landscaping and planting	Pending	<p>CCB Comments</p> <p>(i) As this is a new site we recommend that this is a good candidate for biodiversity accounting, comprising an assessment of what is currently there, what biodiversity units are being lost and are the proposed works sufficient to replace the lost units? On first review of the papers it appears that there is sufficient mitigation to mitigate for biodiversity lost but CCB encourages this approach as a matter of course and this a matter consistent with the National Planning Policy Framework paragraph 170 (d) '<i>minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure</i>'. We accept that this could also fall within the scope of the condition dealing with the long term (25 years) maintenance plan for landscape and habitats.</p> <p>(ii) Due to the 25 year minimum life of this permission the proposed bunding will have to be considered as a semi-permanent feature. The outside gradient could be a shallower, to give a more natural profile. A steeper inside gradient could be achieved by some form of bank stabilisation. A shallower profile would be easier to manage as part of the remaining grass area and be more appropriate to the AONB landscape that surrounds. We note that the grass area is to be sown with an Emorsgate wildflower seed mixes. These are good but they do need to be sown correctly and there needs to be investment into on-going management. A cutting and removal (or grazing) regime will be</p>	6.8.18
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					<p>required. Again this can fall within the (25 years) maintenance plan.</p> <p>(iii) The existing site is itself bunded but poorly so. We would recommend that this is planted up to give better shielding of the existing buildings and works, in association with the existing application. By following the approach as developed for this condition and following the thinking here to the existing site, the overall site will be better conserved in its landscape setting. This of course falls outside the current application but represents an opportunity to be embraced.</p>	
<p>Land Rear of Park Mill Farm Park Mill Princes Risborough Bucks</p>	<p>WDC</p>	<p>18/07096/OU TEA (150 scheme)</p> <p>18/07097/OU TEA (500 scheme)</p>	<p>Outline application with all matters reserved for the construction of up to 150 dwellings, public open space, landscaping and sustainable urban drainage features at WDC reference (150 scheme)</p> <p>Outline application with all matters reserved for the construction of up to 500 dwellings, public open space, landscaping and sustainable urban drainage features Land Rear Of Park Mill Farm Park Mill Princes Risborough Buckinghamshire WDC reference</p>	<p>Pending</p>	<p>CCB Comments</p> <p>These proposals fall within the wider setting of the Chilterns Area of Outstanding Natural Beauty. This impact is appreciated from views outwards as well as views as views towards the escarpment and generates the need for mitigation to conserve and enhance the Chilterns, and address the understandably increased number of visitors to it arising from the expansion of Princes Risborough. CCB has made a series of Local Plan representations, calling for deletion and/or amendment of various policies that affect the Princes Risborough strategic growth allocation. With this application submitted in parallel with the examination-in-public, CCB would request that the application is determined after the Inspector has reported on the Local Plan.</p> <p>Comments related to: (1) Emerging Local Plan 2033 CCB Representations (2) Landscape impacts. The applicant's Environmental Statement (ES) reports in chapter 8 (landscape 8.14) that Policy L1 and CS 17 on</p>	<p>17.9.18</p>

					<p>setting are material and rightly recognises the strategic objective in the emerging Local Plan to '<i>Cherish the Chilterns</i>'. The AONB is some 625 metres from the AONB boundary, at the base of the escarpment, with Brush Hill and Whiteleaf Hill about 1.8km to the east. The application site sites within the Southern Clay Vale.</p> <p>(3) Cumulative impacts. The future of the site must be properly assessed as part of the wider area of land under discussion for development. The plan making process will allow for the cumulative impacts of development to be taken into account, following sustainability appraisal. The impact on views from the AONB should not be assessed for this application site alone, but in combination with the remaining policy area as identified for growth</p> <p>(4) On-Site Mitigation. To protect the setting of the Chilterns AONB as enjoyed from publicly accessible and very popular vantage points, a detailed mitigation and enhancement strategy should be put in place. The submitted master-plan indicates broad parameters and design concepts that (a) development is more confined to the eastern part of the site and that (b) the applicant's LVIA specifically reports back as to how roofscapes / design / density / layout takes account of views down from the escarpment, to ensure that the existing setting is conserved and enhanced, wherever possible.</p>	
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<p>Outline application for up to 37 Assisted Living Units, and provision of a Care Home (All C2 Use), 4 staff accommodation units and site access (all other matters reserved for future consideration) at Shirburn Road Watlington</p>	<p>SODC</p>	<p>P18/S0002/O</p>	<p>As clarified by alternative indicative layout and additional information accompanying Agents letter dated 18 June 2018. SODC:</p>	<p>Pending</p>	<p>CCB Comments</p> <p>This site is WAT 7 in the SODC Landscape Capacity Assessment: Sites on the Edge of the Larger Villages in South Oxfordshire, Main Report (2015) and in which a principal focus is directed to a measure of landscape repair, proximity to AONB and historic parkland and the spread of development with attention to a strong landscape edge. The study concludes that <i>'Notwithstanding the current levels of screening and although the site already contains substantial buildings and hardstandings, it is recommended that redevelopment of a similar area of floorspace or of a similar mass and scale would be detrimental to the local landscape and settlement character and the setting of the AONB and Shirburn Park'</i> and continues that <i>'The site could be considered further as a potential site option provided that any development is no higher than the existing and the mass and scale of the built form is reduced'</i> CCB concludes that this study gives weight to our point as to robust landscaping and the need for careful attention to the urban design treatment here.</p>	<p>16.7.18</p>
<p>Scoping Opinion M1 to A6 2.75 mile (4.4 km) long road link for Central Bedfordshire Council</p>	<p>CBC</p>	<p>CB/18/02714/SCO</p>	<p>- Environmental Impact Assessment Scoping Report CBC Reference:</p>	<p>n/a</p>	<p>CCB Comments</p> <p>The CCB submitted initial concerns based on matters of: (i) Process, in which the M1 to A6 link project is pressing on ahead of the local plan in which the northern expansion of Luton will be examined. (ii) Consideration of alternatives, in which the routing can be further south and outside the AONB as a reasonable alternative when considering the application of legislation, national and development plan policy that protects this</p>	<p>28.8.18</p>

					<p>nationally protected landscape. (iii) Design detail, in which the road will cause serious severance to ecology and recreation. A subway seems a particularly urbanising and poor choice of crossing. A green over bridge sounds more promising with exemplary projects including the A21 land bridge at Lamberhurst in Kent (also see Natural England Commissioned Report 2015 NECR181 on Green Bridges - A literature review, as researched by Land Use Consultants). (iv) The alignment of the road is likely to be a problem in long views from the Galley and Warden Hills – lessons can be learnt here from the main viewpoint on the top of Coombe Hill in Bucks which has been harmed by the A413 link road, where the road runs directly along the line of sight from the monument, introducing an urban feature and distracting motion to tranquil long views. (v) Longer term cumulative impacts involving the generation of traffic through the AONB with consequent effects on air quality, loss of tranquillity from noise and motion, nitrogen deposition on fragile habitats and species. (vi) Lighting design issues with the potential for tall lighting columns, especially at roundabouts, and blue-white high colour temperature LED lighting. All would be detrimental to ecology and the dark skies of the AONB. This design treatment in the new Houghton Regis gives us cause for concern as the lighting here illustrates how urbanising and intrusive such lighting design can become. (vii) Noise impacts and noise mitigation (quiet surfacing, noise barriers and their design, colour, materials etc) will be matters of considerable</p>	
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					importance. (viii) The cumulative implications that will follow with increased pressure for urban expansion and further road links across the AONB to the A505. Policy reassurances here will be paramount.	
The Old Reservoir Greenmore Woodcote	SODC PINS	PINS reference: APP/Q3115/ W/18/319727 0 SODC reference P17/S4336/F UL	Planning Appeal by Mr C Stanley against the decision to refuse planning permission for the 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 at		CCB Written Representations As the Neighbourhood Plan must be consistent with the strategic direction of the Core Strategy policy, it results in a restatement of the policy duties as set out in the key provisions of Policy CSEN1 on landscape matters. The district's distinct landscape character and key features will be protected against inappropriate development and where possible enhanced. The policy states that where development is acceptable in principle, measures will be sought to integrate it into the landscape character of the area and that (ii) High priority will be given to conservation and enhancement of the Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty (AONBs). Proposals which support the economies and social well-being of the AONBs and their communities, including affordable housing schemes, will be encouraged provided they do not conflict with the aims of conservation and enhancement. 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 and this policy must carry full weight in any assessment as to impact upon the AONB.	17.8.18

Navarac Oakley Wood near Nuffield		P18/S2357/F UL	Demolish existing residence and build new residence SODC + Demolition of an existing workshop and sheds, construction of two new live/work units.	Pending	<p>CCB Comments</p> <p>The submitted drawings are largely indicative and would require further details as drawn from the Chilterns Buildings Design Guide and Supplementary Technical notes on materials. This may be a case for planning conditions to reserve further submission of design details. Demolition of an existing workshop and sheds, construction of two new live/work units - the previously submitted 3 units has been reduced to 2. As these units are now more nested within the frame of the existing development there is less impact on the wider landscape. Their design and appearance needs to reflect the live/work element and an appropriate planning condition will be required as to occupancy to restrict future conversion of the work element to residential accommodation. The site is screened to the north by the woodland but any further and appropriate screening to the western boundary would be welcomed.</p>	9.8.18
Old Hazardous Waste Transfer Station Area, Grundons, Ewelme, OX10 6PJ	OCC	MW.0025/18	Open Storage Area for Empty Containers, Bins and Packaging Equipment, Including the Retention of the Old Lab Smalls Building for the Storage of Equipment	Pending	<p>CCB Objection</p> <p>The site is within the Chilterns AONB and in principle this not a use that is compatible with conserving and enhancing the natural beauty of the Chilterns AONB. It appears contrary to the Oxfordshire Minerals and Waste Local Plan Core Strategy policy W4 which requires waste facilities in rural areas to be small in scale and in-keeping with their surroundings, and policy C5 of Core Strategy on visual intrusion. Further, Policy C8 of the Core Strategy gives great weight to conserving the landscape and scenic beauty of the Area of Outstanding Natural Beauty (AONB) and</p>	13.9.18

					<p>that such development shall be both small-scale and sensitively located and designed. The applicant makes no comment at all on policy C8.</p> <p>Further, the application appears contrary to: (1) The AONB Management Plan 2014-2019 Policies L5, D16, D11(2), NPPF para 172 and Policy CSEN1 of the Local Plan</p> <p>As with previous applications the quality, depth and extent of information provided with this application is poor, lacking for instance a landscape and visual impact assessment (LVIA). Important footpaths the Swan's Way and Chiltern Way pass close by. The application form asserts that the site cannot be seen from public roads or public footpaths (but offers no LVIA prepared in accordance with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment 3rd Ed to demonstrate this), that the land is not contaminated, and that no hazardous waste is involved in the proposal. This seems counterintuitive given the proposal, the site and its history.</p> <p>Since the application is retrospective, the impacts of the current open storage area for containers can be assessed on the ground. Impacts to consider include effects on tranquillity like skip clanking noise, reversing vehicles, lorry movements, loss of greenfield land planned to be restored to agriculture, landscape and visual impacts, retention of a building that is not compliant with the Chilterns Buildings Design Guide, odours, and enabling operations involving hazardous waste being</p>	
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					<p>brought into the AONB and waste being disposed of in the AONB. The proposal involves substituting temporary with permanent development. The application proposes no limit on scale, number of containers, stacking height, time of operations, so if permitted could be intensified in the future and have greater impacts. Suggest the application of conditions to address these points.</p> <p>There is no proposed mitigation or amelioration of impacts.</p> <p>Recommendation: If permitted, a package of AONB mitigation and enhancement measures should be provided, having regard to the Chilterns AONB Management Plan which is a material consideration in the determination of planning applications. Mitigation measures could include addressing the wider site within Grundon's control. At the moment the site is among the most significant detractors from natural beauty in the South Oxfordshire part of the Chilterns AONB. CCB could provide advice on a package of AONB measures to enhance habitats, address the visual impact of the entrance, improve fencing design, enhance screening, address light pollution, and consider the colour of buildings and signs. For instance the open frontage on the southern side of the waste site allows clear view in (unlike the northern site which has a staggered entrance and tree planting). With these mitigation measures there will still be residual harm, so we suggest provision of a sum towards projects meeting Chilterns AONB management plan objectives.</p>	
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Abbey Barn Reserve Site	WDC	18/05363/FUL	550 dwellings	Pending	<p>CCB Comments</p> <p>A development of this scale will impact widely and pages 24 and 25 of the LVIA deal with minimising lighting glare impacts into the wider landscape. These matters would need to be controlled by a planning condition requiring a schedule of details and technical controls to be enforced during the construction period. Vehicular routing for construction traffic must avoid the AONB as an option between the M40 and the M4. The location of Abbey Barn Lane to the Chilterns (via Heath End means that traffic emanating from this site, once completed, will exert a cumulative impact upon the AONB. A transport plan as proposed with this development must include robust measures to promote public transport alternatives. The LVIA makes the point at its paragraph 5.2.29 that any impact on the AONB will be negligible. As a settings impact here is a matter that has been assessed in the application CCB would ask that careful consideration is given to the matters as above regarding layout/screening and construction lighting and vehicular routing, to conserve the special qualities of the AONB as required by the CROW Act 2000 and in Development Plan,</p>	10.10.18
Land at New House Farm Farm Road Chorleywood Buckinghamshire WD3 5QB	CDC	PL/18/2195/F A	Change of use of equestrian facilities to a mixed use of equestrian and canine facilities.	Granted 12.11.18	<p>CCB Objection</p> <p>CCB objects to this application which does not conserve and enhance the Chilterns AONB. The site is within the nationally protected landscape, para 172 of the NPPF requires great weight to be given to conservation and enhancement of landscape and scenic beauty. There is no supporting information</p>	11.10.18

					<p>submitted regarding five important areas, so there is insufficient information for the council to make a decision. These are 1) landscape and visual impact, 2) noise assessment, 3) lighting assessment (re: prevention of light pollution) 4) trip generation data, and 5) information on how dog waste and effluent will be disposed of to protect soils, grassland and the chalk aquifer. Our initial view is that the near-constant barking of dogs harms the tranquillity of the AONB. There is an increased number of vehicles attracted to the site. We note the Highways comments about the need for widening to meet standards, but this would be likely to bring detrimental impacts on the character and appearance of rural roads and lanes. The effect on the biodiversity of the adjacent protected woodland also requires consideration. CCB asks that this application is refused and the site restored to a character and appearance compatible with its location in the nationally protected landscape.</p>	
Bury Spinney Houghton Regis	PINS	APP/3211493	100 dwellings	Pending	<p>CCB Comments</p> <p>This development area is located to the north of the Chilterns AONB. The CCB is aware that development beyond the AONB can exert an impact on the setting of the AONB, both cumulatively and individually. This site appears to be contained within its context and is set away from the AONB by some distance. The West of Bidwell application was accompanied by a landscape and visual impact assessment (LVIA) and a parameter plan dealing with building heights (approved plan 1362/PL04). The LVIA for West of Bidwell stated in conclusion that (paragraph</p>	23.10.18

					<p>9.3.12) It is considered that the Bidwell West scheme can be integrated within this landscape context alongside the A5/M1 Link and Thorn Turn developments without significant cumulative effects upon the setting of the AONB. This designation is located to the south of Houghton Regis, and whilst some views of the proposed developments will be available from certain elevated viewpoints, they will be seen within the context of the wider urban area and will not compromise the qualities or amenities of the landscape and visual environment associated with this designation. CCB would promote a similar appraisal as to impact and with reference to cumulative impact and our position statement. We also support the use of design coding and lighting assessment and appraisal, to reduce wider impacts and to promote design that will incorporate green infrastructure and other design features to mitigate wider views from the chalk escarpment and within the AONB</p>	
Land north and east of Glynswood High Wycombe	18/07274/O UT	WDC	39 dwellings		<p>CCB Objection</p> <p>This application, assessed against adopted development plan policies, is clearly contrary to Green Belt policy, as well as being major development in the AONB, and should be a straightforward refusal. We note that the site is proposed for allocation in the emerging Wycombe local plan, but very limited weight can be accorded to this given that there are significant objections to the allocation. The applicant is aware of this issue and suggests that determination is extended until after the Local Plan has run its course. The timetable indicated at the</p>	3.10.18

					<p>close of the examination would put this back to summer 2019. The agent points out that this early submission is to demonstrate deliverability within the context of the NPPF tests. This can only be given very limited weight in the determination of a planning application because such matters relate to the tests of policy soundness and not the legal and policy duties that prevail when deciding a planning application. WDC agrees with this in that the pre-application EIA screening opinion (dated 28th September 2017) makes the point that no determination can be made until the Local Plan has concluded. It also makes the point that development would have 'a clear urbanising impact on part of the AONB'. CCB has recommended that site HW9 be deleted as an allocation in the emerging plan, therefore, the Inspector's recommendations following the examination in public should be allowed to run its course. We question the need to submit this application in the first place.</p>	
<p>Valley View, Hemel Hempstead Road, Dagnall, Berkhamsted</p>	<p>CB/18/03451/ VOC</p>	<p>CBC</p>	<p>Variation of Condition: Conditions 3 & 5 of planning permission CB/13/03219/FU LL Consent to be changed from Temporary to Permanent.</p>		<p>CCB Comment / Part Objection</p> <p>In this case a long planning history has culminated with the Secretary of State's decision in July 2016 to issue a 3 year temporary consent for the additional static and touring caravans. This is a clear and definitive material planning consideration and weight must be given. The rationale behind the temporary consent was to allow the Local Planning Authority the opportunity within the Local Plan process to deliver new sites after a 3 year period. Whilst the Secretary of State formed the view that there would be a limited visual</p>	<p>10.10. 18</p>

				<p>impact (his paragraph 17), it was accepted that the proposal would have a small degree of harm on the character and appearance of the open countryside 'and will conserve the landscape and scenic beauty of the AONB' (para 25). Even accepting the Secretary of State's point that the AONB impacts were weighed as 'neutral' in the balance, it follows that to end the use at the expiry of the temporary period (thus reverting to an allocated location) would result in a positive improvement to the AONB. In fact the Inspector in her decision balanced a series of very special circumstances against the harm to the AONB and Area of Great Landscape Value (in her decision at paragraph 81). Again it follows that to relocate this use would be a positive benefit to the landscape character of the Gade Valley and would deliver on the planning logic as laid out by the Secretary of State. To grant a permanent permission would extinguish any possibility that this could happen. Further with the current progress on the new Local Plan, such matters are contained in chapter 10 of the regulation 19 submission to the Secretary of State and will be considered in the forthcoming findings of the Inspector following the examination-in-public. CCB is grateful for the opportunity to submit these comments. We would raise objection to a permanent consent because an opportunity is lost to enhance the AONB and accommodate longer term needs via the Local Plan process, for the benefit of all parties. Section 85 of the CROW Act 2000 sets out a duty of regard to deliver the conserving <i>and</i> enhancing the natural beauty</p>
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					of the area of outstanding natural beauty (our emphasis).	
Harebridge Lane, Aston Clinton	18/02793/AOP	AVDC	8 dwellings	Pending	<p>CCB Objection</p> <p>In summary the development of this site would urbanise the AONB and unnecessarily so. It would infill within the AONB to the detriment of its landscape character. The site occupies a prominent site with sweeping views of the landscape across and beyond its curtilage. We cannot see how the development as proposed could be deemed to deliver the conservation or enhancement of the special qualities of the AONB as set out in the CROW Act, in the NPPF and in RA7 of the adopted Local Plan.</p>	16.10.18
Pirton Water Tower, Priors Hill, Pirton Herts	18/01992/FP	NHDC	Residential conversion of water tower	Refused 15.10.18	<p>CCB Objection</p> <p>This structure is an eyesore in the Chilterns AONB and represents a piece of infrastructure which if reductant should be removed, it is not suitable for residential conversion. Policy of the statutory Chilterns AONB Management Plan 2014-2019, which can be a material consideration in planning decisions (see NPPG para 004 Reference ID: 8-004-20140306) sets out that: Policy D10 A reduction in the damaging impacts of utilities and other infrastructure should be sought. Policy D11 Enhancement of the landscape of the AONB should be sought by the removal or mitigation of intrusive developments</p> <p>Residential conversion would make the structure solid, more bulky, and likely to cause glint and glare in the daytime and light pollution at night by introducing glazing at height, which would spill out light from internal rooms at night. We note there is no landscape and visual impact assessment</p>	8.10.18

					<p>with the application, and no attempt to assess impacts on visitors to the AONB and footpaths and viewpoints that the extended structure would be visible from. There is therefore insufficient information. The Chilterns Conservation Board considers this proposal would not conserve and enhance the AONB, could not be made to do so, and should be refused permission.</p> <p>Refusal reason 1 states that <i>.The principle of the development is considered unacceptable owing to its adverse effect on the surrounding openness of the countryside and would fail to conserve or enhance the special character of the AONB.</i></p>	
Nuffield Garage, Crowmarsh Hill nr Wallingford	P18/S2871/F UL	SODC	Retrospective change of use to car sales and erection of fencing.	Refused 5.11.18	<p>CCB Objection</p> <p>The development does not conserve and enhance the natural beauty of the AONB. The site is located within the Open Rolling Downs landscape character area 6 The Central Vale Fringes (in the South Oxfordshire Landscape Character Assessment, Lepus Consulting for SODC 2017). The open rolling downs area has a high visual sensitivity. I carried out a site visit on 3.10.18. The site is elevated on the rising land of Crowmarsh Hill which runs in an unspoilt sweep of Chilterns landscape towards Nettlebed. The car sales use is out of kilter with the character of this area. It is urbanising, with its bright garish flags, bunting, new signage, floodlights, large hardstanding and tall metal palisade fence. There is no proposed mitigation or amelioration of impacts, no native planting has been added to screen the new fence, which has a harsh</p>	9.10.18

					<p>shiny galvanised appearance. A car sales use generates traffic and is unsustainable in this location.</p> <p>CCB asks that the application is refused and the site returned to use compatible with its location in the nationally protected landscape, and the recent unsympathetic additions removed in their entirety</p>	
<p>Lower Little London Farm Little London Wendover Buckinghamshire HP22 6QQ</p>	<p>18/03368/A PP</p>	<p>AVDC</p>	<p>Demolition of existing storage buildings and erection of new storage building with ancillary office, staff room and basement storage.</p>	<p>Pending</p>	<p>CCB Comments</p> <p>The application lies entirely within the Chilterns AONB and within a sensitive location as identified by the Buckinghamshire Landscape Character Assessment (LCA 13.1 - Wendover Gap). We would only propose to make two brief points here in that:</p> <p>(i) The neighbouring site at Upper Little London Farm is the subject of a current application for residential development and this is material and weight must be given to any impacts that arise. CCB has raised objection previously and for ease of reference our previous correspondence is appended below.</p> <p>(ii) That whilst the current application is relatively modest it does increase the footprint of development from 139 to 164 square metres following the demolition of the existing building. If the Lower Little London Farm is to continue with its existing uses in the AONB then as applications come forward they should be assessed against their ability to deliver the high tests that conserve and enhance the special qualities of the AONB. These legislative and policy tests are set out in our previous representations on Upper Little London Farm and can be found below. In this case the materials will have to be consistent with the</p>	<p>23.10.18</p>

					<p>Chilterns Buildings Design Guide and Supplementary Technical Notes and the applicant should be invited to detail such matters now as they set an important precedent for the future upgrading and improvement. Further that supplementary and additional landscaping should also be considered, potentially in the place of the demolished footprint and/or in supplementary planting to the south of the proposed buildings.</p> <p>CCB maintains its stance on the undetermined application at Upper Little London Farm, accepting that that matters falls beyond the current red line site area for Lower Little London Plan. Nevertheless the Local Planning Authority will want to apply legislation, national and local policy consistently and any incremental development here will need to demonstrate the delivery of the conservation and enhancement duty in such legal and policy test.</p>	
Bleinheim Farm, Ewelme	P18/S1619/ FUL	SODC	Demolition of existing bungalow and replacement dwelling	Granted 6.7.18	<p>CCB Objection</p> <p>The contemporary design with its blocky form, flat roof and large expanses of glazing on the south elevation is not in sympathy with the location in the Chilterns AONB. The south elevation is almost entirely glass and could cause glint and glare in the daytime, and spill out light at night. Light pollution on a dark hillside would show as rectangular boxes of yellow white light, harmful to the character and remoteness of this part of the AONB and to its ecology. This is a particularly rural part of the AONB where dark skies and bright stars are important. The design should revisited to address the light spill problem, and reflect the advice in the</p>	21.6.18

					<p>Chilterns Buildings Design Guide.</p> <p>Approved but condition added: "Prior to first occupation of the new dwelling hereby permitted, a scheme for minimising light spillage from the proposed glazing shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented and retained in accordance with the approved details."</p>	
Newnham Manor Crowmarsh Gifford	P16/S3852/ FUL	SODC	<p>Hybrid planning application for the erection of 100 new residential dwellings including new access road off the A4074, public open space (full application) and the provision of school land (outline application) at Newnham Manor, Crowmarsh Gifford (as amended by plans submitted 11 July 2018).</p> <p>Amended Plans</p>	Pending	<p>CCB Comments</p> <p>Chilterns Conservation Board has no objection to these amendments (no 6 dated 11th July 2018). The simplification of the junction on the A4074 Portway looks like an improvement in terms of conserving and enhancing the Chilterns AONB.</p>	24.7.18
Goring Heath Almshouses, Goring Heath	P18/S2399/ LDE	SODC	<p>Replace cobbles with bonded gravel (Grade I listed building)</p>	<p>Granted 22.10.18 (4 year rule)</p>	<p>CCB Objection</p> <p>The Alnutt Almshouses is a Grade 1 Listed Building. We note that the listing made in 1951 refers to and includes the forecourt: "Alnutts Hospital and Attached Forecourt Walls and gate" https://historicengland.org.uk/listing/the-list/list-entry/1194275). It therefore seems relevant that the forecourt is protected, and even if not, is in the setting of and wrapped around by the Grade 1 listed building.</p>	10.10.18

					<p>The historic cobbled forecourt was appropriate and sympathetic to the historic building and to the character of the Chilterns AONB in a way that the resin bounded gravel is not. Further research should be undertaken of historic records and photos of the Almshouses to establish how long the courtyard has been cobbled.</p> <p>The Chilterns AONB Management Plan 2014-2019 policies of relevance include Policy HE3 and Policy HE5</p> <p>A couple of points of process, 1) Certificates of Lawfulness are not relevant to situations where breaches of listed building control are involved. 2) Certificates of Lawfulness appear to be relevant for listed buildings when works are proposed, not existing, and 3) Works would only be lawful if they do not affect the character of the listed building as a building of special architectural or historic interest.</p> <p>In this case the view of the Chilterns Conservation Board is that the works do affect the character of the listed building. Since we understand these locally sourced Bunters cobbles have been stored, the cobbles should be reinstated.</p>	
Land at Hithercroft Farm Wallingford	SODC	P18/S2506/O	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	<p>CCB Comments</p> <p>This application falls within the wider setting of the AONB and this is acknowledged in the SODC pre-application response of April 2018. We set out below the duties that deal with the setting and our previous comments on the adjoining site as considered under P16/S4275/0 for 502 dwellings, which is the subject of a resolution to grant consent, subject to section</p>	25.9.18

					<p>106 discharge. The application site is some 900 metres to the east of the site and was considered in the SODC Capacity Assessment (Sep 2017), including Wallingford, (site WAL 4) also considered within the setting in that the impacts here against 'Potential impact on the AONB' were reported as 'Further urbanisation of the rural approach to the AONBs'</p> <p>CCB would seek some symmetry here between the various landscape master-plans as proposed currently and under P16/S4275/O. The Local Planning Authority may find this beneficial when determining the application because the Winterbrook application's illustrative master- plan denotes large areas of green infrastructure to the east, north and partially to the western boundary (facing the railway). To further accentuate the separation of development within its wider context CCB would recommend a review of the currently proposed green infrastructure to ensure a parity of approach.</p>	
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APPENDIX 5

Current Live CCB Planning Application Casework

Location	LPA	Ref number	Development	Deadline
The Orchard Houghton Regis	CBC	18/038881/RM	6 Dwellings (reserved matters)	16.11.18
Greendene Farm near Chazey Heath RG4 7UG	SODC	P18/S0650/FUL	The demolition of the buildings at Greendene Farm other than Greendene Farmhouse and the development of a 65-bedroom elderly care home use class C2 with access, car-parking and a comprehensive landscaping strategy. (As clarified by additional ecology information submitted 3 April 2018, additional drainage details submitted 26 April 2018 and 16 October 2018 and amended by plans and Estates Enhancement Plan submitted 7 November 2018).	22.11.18
Chequers End Equestrian Centre Chequers Lane Cadmore End Buckinghamshire HP14 3PQ	WDC	18/07842/FUL	Change of use of existing equine centre (Class D2) to a school (Class D1)	5.12.18

Item 9 **Development Plans Responses**

Author: Lucy Murfett Planning Officer

Lead Organisations: Chilterns Conservation Board

Resources: Staff time

Summary: Since the papers for the last Planning Committee papers in July 2018 representations have been submitted on 9 consultations of which 6 were development plan documents, 1 was a CIL consultation and 2 were infrastructure consultations (Heathrow Airport and Luton Airport expansion). CCB has also participated in 2 plans examinations (Bucks Minerals and Waste Local Plan, and Wycombe Local Plan).

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

Recommendation

1. **That the Committee approves the responses sent in Appendix 6, notes the current consultations on development plans listed in Appendix 7 and provides comments to the Planning Officer as appropriate.**

APPENDIX 6

CCB Responses on Development Plan Consultations:

Consultation document	Consulted by	Response – summary	CCB response date
Ivinghoe Parish Publication Neighbourhood Plan	AVDC	<p>We are pleased that the Parish Council has addressed many of the points the Chilterns Conservation Board raised at the last consultation stage in October 2017 and December 2017. The Board has a number of outstanding comments, as follows:</p> <p>Settlement boundaries</p> <p>1. The Chilterns Conservation Board objects to the settlement boundary shown in Figure 3, 4 and 5. The boundary should be re-drawn more tightly to the settlements. Extensive greenfield land around the villages has been included within the settlement boundary, some of it within the Chilterns Area of Outstanding Natural Beauty (AONB). Policy HSG1 in effect allocates all of this land within the boundary as acceptable in principle for housing development. There is no evidence base on which to do this. There has not been any landscape capacity assessment or assessment of the AONB impacts of developing this land. It is not acceptable to proceed with the wide settlement boundary as drawn. The Chilterns Conservation Board can only imagine that the Parish Council is unaware or not understanding the effect of this settlement boundary and associated policy HSG1, although we have made this point on the draft version.</p> <p>2. The proposed settlement boundary of Ivinghoe on Figure 4 includes greenfield land in the setting of the AONB (eg Ivinghoe golf course, the allotments and woodland off Church Road), again without a landscape capacity assessment or assessment of AONB impacts.</p> <p>3. The proposed settlement boundary at Ivinghoe Aston on Figure 5 is even more troubling in including large areas of greenfield land behind the settlement on the escarpment side of the village and directly in the open view from Ivinghoe Beacon (please see photo overleaf). Housing development would also block views from Ivinghoe Aston to Ivinghoe Beacon, damaging the important visual relationship between village and hill. The scale of development the proposed settlement boundary allows would be disproportionate to the very small size of the Ivinghoe Aston and its place as a smaller village in the AVDC settlement hierarchy, and housing developments would be individually and cumulatively harmful to the AONB.</p> <p>4. Please see the Chilterns Conservation Board's Position Statement on Development Affecting the Setting of the AONB. It explains how developments outside the AONB but in its setting can affect the AONB, and signposts to the Chilterns AONB Management Plan policies concerning AONB setting.</p> <p>6. The proposed settlement boundaries also include land covered by heritage constraints, such as greenfield land in Ivinghoe Conservation Area and next to Listed Buildings, and land to the west of the B488 which could be in the setting of Pitstone Windmill.</p>	1.8.18

	<p>Registered Common Land (the Rag Pit) north of the B489 should not be included in the settlement boundary. There are also biodiversity layers like land within the SSSI Impact Zone, and land containing Priority Habitat (Deciduous Woodland), and land in the Ashridge & Ivinghoe Beacon Biodiversity Opportunity Area. The settlement boundary should be more tightly drawn to hug existing buildings, and exclude parcels of greenfield land many of which are covered by multiple designations or constraints.</p> <p>General approach to the AONB</p> <p>7. The Chilterns Conservation would welcome more emphasis on the Chilterns Area of Outstanding Natural Beauty, explaining the extent of the AONB in the parish and the international significance of the Special Area of Conservation. It should be amended to explain the hierarchy of designations (NPPF para 171 “Plans should: distinguish between the hierarchy of international, national and locally designated sites”), at the moment the hierarchy is unclear, e.g. Area of Attractive Landscape is a local designation and not equivalent to the AONB.</p> <p>8. The Ridgeway National Trail is given a passing mention at para 2.6 but with no explanation of its history or significance. Suggest amendment as follows: “The popular Ridgeway National Trail passes through the parish, an ancient route dating from the Neolithic period running between Avebury in Wiltshire and Ivinghoe Beacon, and widely recognised as England’s oldest road.”</p> <p>9. Para 2.10 which contains photographs of the parish could also contain the view from the village of Ivinghoe or Ivinghoe Aston up to the escarpment. The “view to a hill” is a very strong characteristic feature of the villages, the relationship between spring line settlement and the presence of the grassy hills looming over them is unique. Much of the Chilterns escarpment is wooded or a mosaic of habitats. But the hills at Ivinghoe are beautiful and special because of the strong bare shape of the series of chalk hills. The hills rise and unfold, crested by the white stripe of the Ridgeway path (see photo below). It could be nowhere else.</p> <p>Policy HSG1</p> <p>10. In this latest version of the policy, there is no coverage of impact on views. Please reinstate a bullet point on impact on views into and out of the Area of Outstanding Nature Beauty (AONB), e.g.:</p> <ul style="list-style-type: none">• “Does not give rise to unacceptable impacts on views into and out of the Area of Outstanding Nature Beauty” <p>11. Para 5.4.2 should require Landscape and Visual Impact Assessment for all applications in the AONB and its setting which are likely to affect the AONB:</p> <p>Landscape Character</p> <p>11 Suggest referring to the landscape character assessment: Aylesbury Vale LCA (2008). This will help describe the character and sensitivity of the landscape in the Parish.</p> <p>Policy ENV1 Biodiversity net gain</p> <p>12. CCB welcomes this policy, but disagrees with the text in para 5.5.4 which implies that this policy would not apply in the AONB. The policy should apply to the AONB, and any off-site net gain may</p>	
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		<p>most be usefully delivered in the Biodiversity Opportunity Area and AONB. Suggest delete “where possible” a net gain. As otherwise the NP would be weaker than the NPPF and the district’s emerging policy requiring net gain.</p> <p>Policy REC1 and REC2 Recreation 13. These policies are welcomed but appear to be named strangely.</p> <p>Policy TEL1 Telecommunications technology 14. This policy should refer to nationally protected landscape, as well as rural nature of the neighbourhood. The Board is concerned that “visually sympathetic” could encourage colour or design solutions, but if badly sited and prominent in views masts would still be seriously harmful. The policy should protect from the detrimental effects of poorly sited and poorly designed telecoms infrastructure. Be aware that the latest masts designs may be taller than existing familiar designs, so it is undesirable to give blanket support to the latest designs.</p> <p>Mapping 15. Although the mapping has improved since the early version of the plan with the addition of maps from the Environmental Records Centre, some maps are still not clear enough:</p> <p>16. We have a model AONB policy and some advice on our neighbourhood planning webpage.</p>	
Wycombe Local Plan - Examination Statement-Sept sessions	PINS	<p>CCB submitted 4 extensive statements on:</p> <p>Matter 7 – Development Framework: High Wycombe Matter 8 – Development Framework: Princes Risborough Matter 9 – Development Framework: Rural Areas Matter 10 – Development Framework: Marlow</p> <p>These CCB statements are available online via https://www.wycombe.gov.uk/pages/Planning-and-building-control/New-local-plan/New-local-plan-examination.aspx The statements repeated and expanded on points made in CCB’s representations on the Regulation 19 Publication Local Plan on 24.11.17 (reported in March 2018 CCB Planning Committee Papers)</p>	2.8.18
Great and Little Kimble Neighbourhood Plan	WDC	<p>CCB issues a holding objection to all sites shortlisted which have not been assessed for their landscape and visual impact. You are lacking landscape sensitivity evidence for most of the shortlisted sites. This is a key part of the evidence base you will need for your plan.</p> <p>2. The south eastern third of the neighbourhood area falls within the Chilterns Area of Outstanding Natural Beauty (AONB), nationally designated as one of the country’s finest landscapes, and much of the area that is not designated AONB forms part of the setting of the Chilterns AONB. Your consultation materials fail to refer to the setting of the AONB or give weight to it.</p> <p>3. The panoramic views from the top of the escarpment (especially from Beacon Hill, Coombe Hill and Whiteleaf) and the views to the</p>	2.8.18

		<p>dramatic iconic chalk landform of Beacon Hill from the villages makes this a special and remarkable area of which the parish can be justly proud.</p> <p>4. Where there are strong views of sites from the Chilterns escarpment eg Beacon Hill, Coombe Hill, Whiteleaf, sites should not be taken forward for development. Equally where development would damage views, particularly views from public footpaths to the Chilterns escarpment, by blocking or interfering with open views to the hills, sites should be discounted. For example, this development on the north side of Chinnor has damaged the setting of the AONB because it has harmed the view towards the escarpment. The edge of Chinnor is now very visible from the Thame Road and the Emmington Road and the public footpaths in between. The development is particularly visible because of the alignment of the houses tightly packed in a row parallel to the escarpment, and the lack of screening planting.</p> <p>5. Greenfield sites around the villages have been included as site options. The site that the Kimble Area Landscape Sensitivity & Capacity Study (WDC Sept 2017) identified as having the highest capacity for development in landscape terms (site 5 in that study), and the only one with high capacity, is not shortlisted in your consultation. The only ones in both the WDC study and the consultation are site 17a, 17b and 14 (all of which were scored as medium capacity for development in landscape terms). Sites should only be taken forward where Landscape Capacity Assessment finds the sites acceptable. Landscape capacity assessment is likely to mean that some of your consultation sites are unacceptable, others could only accommodate development on part of the site and a reduced development area should be identified.</p> <p>6. The suggested layouts on the exhibition boards do not appear to have been rooted in a landscape-led approach, and instead appear to be about filling up the shape of the plots. This results in some poor planning e.g. backland development and ribbon development, breaching principles of good planning and unacceptable in terms of conserving and enhancing the Chilterns AONB.</p> <p>7. The scale of development proposed would be disproportionate to the small size of Little Kimble and Smokey Row.</p> <p>8. Please see the Chilterns Conservation Board's Position Statement on Development Affecting the Setting of the AONB. It explains how developments outside the AONB but in its setting can affect the AONB, and signposts to the Chilterns AONB Management Plan policies concerning AONB setting.</p> <p>Please engage further with the Chilterns Conservation Board as we are the statutory body for the Chilterns AONB.</p>	
<p>Heathrow Airport (Third Runway) ES Scoping Opinion</p>	<p>PINS</p>	<p>Going forward the Chilterns Conservation Board would like to be involved as stakeholders and consultees in the Heathrow work please, in order to advise on whether the plans conserve and enhance the Chilterns AONB, and to ensure that relevant assessments are included in the ES. For info, the Chilterns Conservation Board is the statutory independent corporate body for</p>	<p>2.8.18</p>

		<p>the Chilterns Area of Outstanding Natural Beauty, set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000. The Chilterns Conservation Board is a statutory consultee for National Policy Statement consultations, a prescribed consultee for major infrastructure projects that affect the Chilterns AONB and an interested party for examinations in connection with Nationally Significant Infrastructure Projects that may affect the Chilterns AONB (as set out in the Infrastructure Planning (National Policy Statement Consultation) Regulations (2009), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations (2009) and the Infrastructure Planning (Interested Parties) Regulations (2010).</p> <p>In brief, our main concerns regarding Heathrow expansion are likely to be:</p> <ul style="list-style-type: none"> • noise and effects on tranquilly from overflying the Chilterns AONB • air pollution and effects on sensitive habitats in the Chilterns including protected sites of national and international importance • cumulative impacts from the combined changes in flightpaths from Luton and Heathrow - it is important that in any redesign of flightpaths there is careful design to avoid harm to the tranquillity of the AONB, and take all opportunities to reduce noise over the AONB (eg Bovingdon stack) • people walking, cycling, riding or volunteering in the AONB are likely to be outdoors and expecting to enjoy an experience of 'getting away from it all' so are especially noise sensitive • The Chilterns Conservation Board could also assist with identifying opportunities for AONB mitigation and enhancement <p>Our more detailed comments and concerns on the Scoping Report:</p> <ul style="list-style-type: none"> • Ch 5 Air quality: is the proposed study area (approx. 12km x 11km) wide enough? • Ch 6 Biodiversity: is the proposed study area ("maximum amount of landtake being considered for full range of options") sufficient? • Ch 11: We note this says that there will be a different noise study area where there is a relevant historic environment aspect (clarify bigger / smaller?) • Ch 13: Landscape and visual amenity: is the proposed study area (5km beyond maximum landtake) wide enough? Might Heathrow be visible enough from some locations to be considered to be in the setting of the AONB? • We note that tranquillity is covered in this Chapter, rather than the noise chapter. • Ch 16 Noise: concerned that the proposed study area (encompassing where aircraft are expected to be 4000ft or below) is not wide enough • Ch 17 Traffic and Transport: is the proposed study area (roads where overall traffic will increase by 30%, or HGVs by 10% on "sensitive" (congested) routes) wide enough? 	
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		<ul style="list-style-type: none"> • Ch 18 Water: is the proposed study area wide enough? We like to see impacts on Chilterns chalk streams included in the "targeted monitoring" in the wider area. <p>The Chilterns Conservation Board would like to express support for the PINS Opinion:</p> <ul style="list-style-type: none"> • that the noise study area is NOT big enough, but should extend to areas overflowed by traffic below 7000ft; and • that it includes helpful references to impacts on the AONB, including cumulative impacts, in the landscape and visual amenity chapter (electronic p59-62 of the Opinion). <p>The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK and public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of CroW Act).</p> <p>[Subsequently CCB Planning Officer also attended a stakeholder meeting on Heathrow Future Airspace Change on 4.10.18]</p>	
<p>Goring Neighbourhood Plan examination – NPPF revisions</p>	<p>SODC</p>	<p>CCB summarised the changes in the NPPF in relation to national policy for AONBs, National Parks and the Broads. The paragraph numbers are altered, with Para 115 and 116 combined into a single paragraph 172.</p> <p>Importantly, despite the government’s focus on increasing housebuilding, the policy on AONBs has not been weakened in any way. The reverse is the case, with:</p> <ul style="list-style-type: none"> • a new twice repeated instruction to “enhance” as well as “conserve” AONBs, and • an entirely new sentence with a clear instruction that “The scale and extent of development within these designated areas should be limited”. <p>The controls on major development in AONBs remain unaltered. However the new footnote 55 provides a helpful new steer on what decision makers should take into account when testing if a proposal constitutes major development, namely “its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”. This goes further than existing advice in the NPPG para 005 Reference ID: 8-005-20140306 which referred only to it being “a matter for the relevant decision taker, taking into account the proposal in question and the local context.”.</p> <p>The presumption in favour of sustainable development at paragraph 11 and footnote 6 now explains that, for plan making activities, being in an AONB provides a “strong reason” for restricting the overall scale, type or distribution of development in the plan area.</p> <p>Interestingly, the new provisions for entry-level exceptions sites (for first time buyers or renters) are specifically prohibited in AONBs (see para 71 and footnote 34: “entry-level exceptions sites should not be permitted in National Parks (or within the Boards Authority),</p>	<p>21.8.18</p>

		<p>Areas of Outstanding Natural Beauty or land designated as Green Belt"). In contrast rural exceptions sites are not restricted in this way (para 77), so that homes for local community members who are either current residents or have an existing family or employment connection, are potentially permissible. The message is that housing to meet identified local community needs is supported, but general wider needs for first time buyers are not.</p> <p>Implications for Goring Neighbourhood Plan In summary, the Chilterns Conservation Board considers that the revised NPPF strengthens government policy for the AONB.</p> <p>The new NPPF provides the clear new instruction that "The scale and extent of development within these designated areas should be limited". This supports the approach of the Goring Neighbourhood plan of using a landscape capacity approach to determine how many new homes Goring can accommodate, rather than seeking to accommodate a mathematically derived share of the district's housing requirement irrespective of the impacts and whether the settlement is in the AONB.</p> <p>The plan has to date ducked the issue of whether the developing the allocated sites would constitute major development in the AONB. This should be addressed. There are now new instructions on assessing for major development: "taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined." The designation purposes are to conserve and enhance the natural beauty of the AONB (Countryside and Rights of Way Act 2000 section 82). Development of GNP3 (Manor Road) and GNP6 (Springhill Farm) is, in the Chilterns Conservation Board's view, likely to constitute major development in the AONB, for the reasons set out in our response dated 7th June 2018. This should not be parked for the planning application stage.</p> <p>Another more minor change needed is that Objective 04 on protecting the landscape should delete "maintain and where possible enhance" and instead refer to "conserve and enhance" as the NPPF does.</p>	
Bucks Minerals and Waste examination	PINS	<p>Attended examination for Matters 7 and 8. Relied on original written reps rather than submitting additional statements</p>	31.8.18
Future LuToN - Making Best Use of our Runway Consultation	LLA	<p>1. Several Chilterns Conservation Board members and the Board's planning officer attended LLAL exhibitions held this summer. We are grateful for the opportunity to comment on the LLAL Future LuToN consultation documents.</p> <p>2. The Chilterns AONB is a nationally protected landscape close to Luton Airport and is likely to be impacted in many ways by the proposed expansion of passenger numbers from the permitted 18 million to 36-38 million passengers per annum.</p> <p>3. The western approach to the airport falls within the Chilterns Area of Outstanding Natural Beauty (AONB). Much of the closer area that is not designated AONB forms part of the setting of the</p>	31.8.18

		<p>Chilterns AONB. Your consultation materials fail to refer to the AONB or the setting of the AONB, or give weight to either. The map below shows the boundary of the Chilterns AONB in green. We have guidance on AONB setting here https://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html</p> <p>4. Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England and Wales are conserved and enhanced. In policy terms they have the same planning status as National Parks (National Planning Policy Framework 2018, para 172). The Chilterns AONB was designated in 1965 and extended in 1990. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.</p> <p>5. Section 85 of the Countryside and Rights of Way Act 2000 places a statutory duty on local authorities and statutory undertakers 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>6. The Future LuToN consultation does not ask important questions about whether the scale of growth proposed is sustainable or desirable. It is closed on matters of principle and instead asks for feedback on four layout options for the expanded airport. It fails to ask for feedback on reasonable alternatives, like no growth, or a smaller scale of growth in passenger numbers delivered with an extension to the existing terminal. The Chilterns Conservation Board objects to this lack of consultation on the principle, and recommends that this is addressed in order to comply with legislation on impact assessment.</p> <p>7. As well as the consultation being too narrow in scope, the mapping does not show a wide enough area to show where impacts would be experienced. Luton Airport is only 2km from the Chilterns AONB. The photograph in the consultation document (at page 8) displays clearly the airport's location on a plateau in the Chiltern hills, with the runway pointing directly at the Chilterns AONB:</p> <p>8. Nowhere, not even in the full consultation document, is the Chilterns AONB mentioned. Page 63 refers to the surrounding landscape being recognised for its "local landscape value". This indicates a worrying lack of regard to the AONB (see para 5 above on the statutory duty of regard). We are not satisfied that the emerging plans would conserve and enhance the Chilterns AONB, because this has not been demonstrated. AONB impacts have not been explored.</p> <p>9. To remedy this, the project should assess impacts on the Chilterns AONB, including the following:</p>	
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	<p>Aircraft noise: caused by associated changes in overflying of the Chilterns AONB (with both arrivals and departures from Luton Airport being among the main current sources of noise)</p> <p>Visual intrusion from aircraft: this is caused by all over flying aircraft at all heights. It is already commonplace to be able to see and hear several aircraft at once</p> <p>Visual intrusion from the airport development: buildings, roads, car parks, earthworks etc, assessing whether visible either in views from the Chilterns AONB or views to the Chilterns AONB</p> <p>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</p> <p>Disturbance: especially night flights and early and late arrivals</p> <p>Stacking: in particular the Bovingdon Stack restricts the airspace leading to increases in noise.</p> <p>Levels of air pollution and effects on plants and sensitive habitats in the Chilterns including protected sites of national and international importance</p> <p>Contrails: the large numbers of over-flying aircraft are generating considerable numbers of contrails which often combine to create a "cloud" layer thus depriving the public of sunshine</p> <p>Effect on traffic through the AONB: testing for increased traffic generation on rural roads, many of which are in the AONB are attractive narrow lanes and ancient routes which form part of the special character of the AONB</p> <p>Enjoyment of Public Rights of Way: including the Chiltern Way (a 125 mile circular path) and the Chilterns Cycleway (a 170 mile circular cycle route) and the North Chiltern Trail (a 42 mile circuit) all of which pass close to Luton Airport</p> <p>Parking: pressures from private firms to set up satellite car parks in the AONB</p> <p>Artificial light pollution: from aircraft and the airport harming dark skies and depriving people of the experience of bright stars</p> <p>Water abstraction: water supply impacts on the chalk aquifer and the already over-abstracted River Ver, a globally rare chalk stream arising in the Chilterns AONB</p> <p>Cumulative effects: combined with other major projects like HS2, the Oxford-Cambridge expressway and Ca-MK-Ox growth corridor, Century Park and major greenfield housing development around Luton, Aylesbury and Hemel Hempstead.</p> <p>10. We understand that any change in flightpaths will be governed by the Civil Aviation Authority and subject to a separate process. There are likely to be cumulative impacts from the combined changes in flightpaths from an expanded Luton and Heathrow Third Runway- it is important that in any redesign of flightpaths there is careful design to avoid harm to the tranquillity of the AONB, and take all opportunities to reduce noise over the AONB (eg Bovingdon stack).</p> <p>11. The Chilterns Conservation Board could assist with identifying opportunities for mitigation and AONB enhancement, for example</p>	
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		<p>as part of the proposed North Chilterns Heritage Lottery Fund project “Chalkscapes”.</p> <p>12. The Chilterns Conservation Board is grateful for the opportunity to make these written comments. Going forward the Chilterns Conservation Board would like to be involved as stakeholders in order to advise on whether the plans conserve and enhance the Chilterns AONB, and to ensure that relevant assessments are included in the Environmental Statement. The Chilterns Conservation Board is the statutory independent corporate body for the Chilterns Area of Outstanding Natural Beauty, set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000. The Chilterns Conservation Board is a statutory consultee for National Policy Statement consultations, a prescribed consultee for major infrastructure projects that affect the Chilterns AONB and an interested party for examinations in connection with Nationally Significant Infrastructure Projects that may affect the Chilterns AONB (as set out in the Infrastructure Planning (National Policy Statement Consultation) Regulations (2009), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations (2009) and the Infrastructure Planning (Interested Parties) Regulations (2010).</p> <p>13. The Chilterns Conservation Board should therefore be involved in the emerging 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. We suggest the LLAL uses our chargeable pre-application advice service or enters into a service level agreement to secure sufficient AONB planning input to the process.</p>	
South Oxfordshire CIL - Consultation on draft South Oxfordshire CIL strategy	SODC	<p>The Chilterns Conservation Board welcomes the inclusion of biodiversity in the CIL spending strategy.</p> <p>However it is unclear in the strategy as currently drafted how the SODC element will be spent, and we ask that provision is made and confirmed in the strategy document for partner organisations to bid for funds to deliver biodiversity projects. It is likely that Chilterns Conservation Board would be interested in using CIL funding to deliver ecological enhancement projects in the Chilterns AONB.</p>	14.9.18
Oxfordshire Minerals and Waste Local Plan Part 2 Site Allocations Issues and Options	OCC	<p>Question 1 – selection of site options</p> <p>Taking into account the need for certainty about delivery of sites in order that the Sites Plan will meet the test of soundness that it is “effective”:</p> <p>A. Should site allocations in the Sites Plan be drawn only from those sites that have been nominated by landowners or mineral/waste operators?</p> <p>Your response: A. Chilterns Conservation Board makes no comment on this.</p> <p>B. Should other sites, in addition to those nominated, be considered for possible allocation in the Sites Plan and, if so, how should they be selected?</p>	3.10.18

	<p>B. Unsure but if so, see below. If considering other sites, great weight should be given to the AONB in line with Policy C8 of the Core Strategy which gives great weight to conserving the landscape and scenic beauty of the Area of Outstanding Natural Beauty (AONB) and sets out that such development shall be both small-scale and sensitively located and designed. OCC has a legal duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. Applying great weight to the AONB when deciding whether to allocate minerals and waste sites is a good means of demonstrating this.</p> <p>Question 2 – issues relating to nominated sites</p> <p>Site number 224: Ambrose Quarry Site number 138: Woodside, Old Henley Road, Ewelme Site number 013: Ewelme No. 2 Site, Goulds Grove Site number 152: Ewelme No. 1 Site, Goulds Grove Site number SG-61: Mains Motors</p> <p>Your response: Do not allocate these sites</p> <p>These sites are in the Chilterns AONB. Great weight should be given to the AONB in line with Policy C8 of the Core Strategy which gives great weight to conserving the landscape and scenic beauty of the Area of Outstanding Natural Beauty (AONB) and sets out that such development shall be both small-scale and sensitively located and designed. The Chilterns AONB Management Plan 2014-2019 policies are also relevant and a material consideration: L5 ‘Developments which detract from the Chilterns’ special character should be resisted’ D16 – ‘The environmental impacts on the Chilterns (including those arising from through traffic) of quarrying and the operation of landfill sites and other waste management facilities within and adjacent to the AONB should be minimised’, and D11 ‘Enhancement of the landscape should be sought by the removal or mitigation of intrusive developments’ Para 172 of the NPPF sets out that ‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs, which have the highest status of protection in relation to landscape and scenic beauty’ and major development should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. OCC has a legal duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. Applying great weight to the AONB when deciding whether to allocate minerals and waste sites is a good means of demonstrating this.</p> <p>Site number SG-12: Land South of Chazey Wood Site number SG-33: Land south of Wallingford, New Barn Farm Site number SG-60: White Cross Farm</p>	
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	<p>Your response: Do not allocate these sites</p> <p>These sites are the setting of the Chilterns AONB. The Chilterns Conservation Board's Position Statement on Development Affecting the Setting of the Chilterns AONB explains how development outside the AONB can affect the AONB. The legal duty on local authorities regarding conserving and enhancing the natural beauty of AONB does not just apply within the AONB; the only consideration is whether land in the AONB is affected, not where the effect originates. With regards to minerals and waste development in the setting of the AONB, there are many potential impacts on the AONB, for example: visual impacts, blocking or spoiling views to or from the AONB, breaking the skyline (chimneys, plumes), HGVs and traffic generation through the AONB, intrusive lighting, dust and air pollution, erosion of landscape character and diminished public enjoyment of the AONB. OCC has a legal duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. Applying great weight to the AONB when deciding whether to allocate minerals and waste sites in the AONB and the setting of the AONB is a good means of demonstrating this.</p> <p>Question 4 – level of mineral working site provision</p> <p>A Should the Sites Plan make only the arithmetic minimum provision in site allocations that is required to meet the additional requirements for mineral working in Annex 1? or B Should provision in allocations also take into account the need to ensure there is sufficient production capacity available throughout the plan period to enable an adequate level of supply (recognising that reserves are not equally distributed between quarries and quarries have differing levels of output)?</p> <p>Your response: A. As mineral working sites bring environmental and community impacts, only the minimum provision should be required. The figures in Annex 1 were established through consultation and examination of the Core Strategy, and should be respected.</p> <p>Question 5 – contingency provision for mineral working</p> <p>A Should some contingency be added to the additional requirements for mineral working site provision to give flexibility in case sites cannot be brought forward or prove not able to deliver the expected yield? and, if yes, B What level of contingency provision would it be appropriate to add: 10%, 20%, 25%, other?</p> <p>Your response: No contingency should be added. As mineral working sites bring environmental and community impacts, only the minimum provision should be required.</p> <p>Question 6 – allocation of sites for soft sand and crushed rock</p> <p>A Should specific sites be allocated for soft sand and crushed rock? or B Should provision be made in some other way, such as by broader areas of search? and, if yes to B C Which areas should be included as areas of search?</p>	
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	<p>Your response: A. No. There is no additional requirement for soft sand crushed rock, so no justification for allocation, since mineral working sites bring environmental and community impacts.</p> <p>Question 7 – size of sites for mineral working</p> <p>A Should a minimum site size (by mineral yield) be applied in the allocation of sites for mineral working? and, if so B What size threshold or thresholds should be used?</p> <p>Your response: A. No. A test of deliverability can be made for each site through the allocation process. If an operator wants to deliver a small site that should not be precluded by screening out using an arbitrary threshold. Small sites may bring fewer environmental and community impacts.</p> <p>Question 8 – priority for extensions over new quarries</p> <p>To what extent should the priority for extensions in Core Strategy policy M4 be applied in relation to other factors in the allocation of sites for: sharp sand and gravel; soft sand; and crushed rock?</p> <p>Your response: High priority should be given to extensions for sharp sand and gravel over new sites to limit the environmental and community impacts of establishing a new quarry. The new quarries proposed for sharp sand and gravel include sites which would affect the nationally protected landscape of the Chilterns AONB, and this cannot be justified and would not pass the tests for major development in the AONB in NPPF para 172 which include whether the need can be met outside the AONB or needs met in some other way, which clearly is the case when existing sites can be expanded.</p> <p>No allocations should be made for soft sand and crushed rock as there is no requirement (see our response to Q6). If this changes and a requirement emerges during the plan period, a case could be made for expanding existing sites through the DM process, and the presumption should be that existing sites are expanded.</p> <p>Issue 4 – Restoration of mineral working sites</p> <p>Question 9 – weight given to restoration objectives</p> <p>What weight should be given to the achievement of the restoration objectives of the Core Strategy relative to other factors in the allocation of sites for mineral working? Your response: Very high weight Please give reasoning for your response</p> <p>The Core Strategy has been through consultation and examination and Policy M10 should be respected. The allocations must deliver net gain, and Core Strategy Policy M10 is an excellent policy. It was ahead of its time and meshes well with subsequent national policy e.g it is a good example of the delivering ambition in the Government's 25 Year Environment Plan (2018) of a net environment gain from all development. The NPPF (2018) embeds net gain for biodiversity into planning policy.</p> <p>Question 10 – specification of restoration requirements</p>	
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	<p>A Should the Sites Plan specify how sites allocated for mineral working are to be restored? and, if yes B How detailed should the specified restoration requirements be?</p> <p>Your response: A Yes B Should specify net environmental gain linked to Conservation Target Area and Landscape Character Area objectives, with detail to follow through the DM process Chilterns Conservation Board strongly supports Core Strategy policy M10. Mineral sites should be restored to nature reserves with public recreational access as the most appropriate afteruse to meet the Government's 25 Year Environment Plan (2018) of a net environment gain from all development. The type of habitat should be informed by Conservation Target Areas and Landscape Character Areas, including the OWLS study. The principle of restoration to natural habitats as in M10 should be in the Sites Plan for all allocations. The value of a habitat that could be created, taking into account its links to local ecological networks could help choose which sites to allocate. Detail can be worked up later for specific sites with professional landscape and ecological input.</p> <p>Issue 5 – Sites already permitted for mineral working</p> <p>Question 11 – allocation of sites already permitted for mineral working Should areas of land that already have planning permission for mineral working be included as site allocations in the Sites Plan?</p> <p>Your response: Yes. Existing permissions should count towards meeting the requirement and be protected for mineral workings. In order to minimise the requirement for new quarries, high priority should be given to existing sites to limit the environmental and community impacts of new ones.</p> <p>Issue 6 – Provision for recycled & secondary aggregates & waste management facilities</p> <p>Question 12 – size of sites for recycled & secondary aggregates and waste management facilities</p> <p>A Should there be a size threshold for sites for recycling / secondary aggregates and waste management facilities allocated in the Sites Plan? And B Should the Sites Plan only allocate sites for strategic and nonstrategic facilities?</p> <p>Your response: A No A test of deliverability can be made for each site through the allocation process. If an operator wants to deliver a small site that should not be precluded by screening out using an arbitrary threshold. Small sites may bring fewer environmental and community impacts and in the case of the AONBs, are the only size of site that should be considered to meet Core Strategy policy C8 "Development within AONBs shall normally only be small-scale, to meet local needs and should be sensitively located and designed". We would prefer that such small-scale facilities are planned through allocations, so that they can be compared with other sites through the plan-making process and tested against the major development test in NPPF para 172, which includes assessing whether there are</p>	
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	<p>sites outside the AONB or whether the need could be met in some other way. Question 13 – identification of other sites</p> <p>Should the County Council seek to identify other sites for recycling / secondary aggregate and waste management facilities for assessment (in addition to those that have been nominated)?</p> <p>Your response: Yes. Accommodating waste uses on industrial estates is a practical solution where such uses are compatible. Such uses employ people and where enclosed within buildings are similar to other types of employment or industry.</p> <p>Question 14 – allocation of industrial estates and employment areas</p> <p>A Should the Sites Plan allocate industrial estates and other broad areas of employment land where waste management facilities could potentially be located? and, if yes B Should this be as well as or instead of the allocation of specific sites?</p> <p>Your response: A Yes B Unsure. Accommodating waste uses on industrial estates is a practical solution where such uses are compatible. Such uses employ people and where enclosed within buildings are similar to other types of employment or industry. Issue 9 – Waste management site safeguarding</p> <p>Question 18 – safeguarding waste management sites</p> <p>A Are there any waste management sites in Appendix 2 of the Core Strategy that should not be safeguarded in the Sites Plan and, if so, why? and B Are there any waste management sites not included in Appendix 2 of the Core Strategy that should be safeguarded in the Sites Plan and, if so, why?</p> <p>Your response: A Yes. There are waste management sites in the Chilterns AONB listed in Core Strategy Appendix 2 which should be restored to natural habitats and for public recreation, and no further future waste development sited here:</p> <p>013 Ewelme No.2 (Grundon) 024 Oakley Wood (W&S Recycling) 138 Woodside (Mains Motors) 152 Ewelme No.1 (Grundon) 184 Rumbolds Pit (R Hazell) 256 Hundridge Farm (Onsyany Skips) Ipsden</p> <p>None of these sites would be acceptable as new sites today. These sites within the Chilterns AONB are not uses compatible with conserving and enhancing the natural beauty of the Chilterns AONB. They are contrary to the Oxfordshire Minerals and Waste Local Plan Core Strategy policy W4 which requires waste facilities in rural areas to be small in scale and in keeping with their surroundings, and policy C5 of Core Strategy on visual intrusion. Further, Policy C8 of the Core Strategy gives great weight to conserving the landscape and scenic beauty of the Area of Outstanding Natural Beauty (AONB) and that such development shall be both small-scale and sensitively located and designed.</p>	
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		OCC has a legal duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. Applying great weight to the AONB when deciding whether to safeguard waste sites is a good means of demonstrating this.	
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APPENDIX 7

Current Development Plan Consultations:

Consultation document	Consulted by	Stage	Deadline for CCB responses
Bovingdon Neighbourhood Plan	DBC	Neighbourhood area designation http://www.dacorum.gov.uk/home/regeneration/neighbourhood-planning/bovingdon-neighbourhood-plan	30.11.18
NPPF/NPPG	MHCLG	Changes to planning policy and guidance including the standard method for assessing local housing need https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need	7.12.18
Validation requirements for planning applications	BCC	Local List of Information Requirements	3.12.18
Community Infrastructure Levy	CDC&SB	Preliminary Draft Charging Schedule http://www.chiltern.gov.uk/planning/cil	14.12.18