EDLESBOROUGH PARISH COUNCIL

Comments Relating To Planning Application PL/26/08283/OA
Land north of Ford Lane, Edlesborough

This application seeks outline planning permission for up to 105 dwellings on a 3.64-hectare greenfield site on the edge of Edlesborough.

1. Background

The site was previously the subject of a similar application by Cala Homes (17/01467/AOP), which sought permission for up to 64 dwellings. That application was refused in May 2019.
More recently, the site has been identified in the Regulation 19 draft Buckinghamshire Plan as having potential to accommodate up to 90 dwellings.

2. Reasons for refusal of application 17/01467/AOP

1. The site lies outside the defined Edlesborough Settlement Boundary.
2. The proposed development failed to respect or complement the physical characteristics of the site and surrounding area. It would represent an unacceptable urbanisation of a rural location outside the Settlement Boundary, result in the loss of open countryside, harm the intrinsic rural character of the village and adversely affect landscape character, including the setting of the adjacent Area of Attractive Landscape (AAL).
3. The site has only limited access by non-car modes of travel. The lack of adequate infrastructure and the site's distance from major built-up areas mean that residents would be highly likely to rely on private cars. This would conflict with the NPPF's aim of focusing significant development in locations that are, or can be made, sustainable, and with the aims of Buckinghamshire's Local Transport Plan.
4. The site was considered incapable of providing acceptably safe and suitable pedestrian access to the village.

3. The previous reasons for refusal remain relevant

3.1 Settlement boundary and relationship to the village

The applicant argues that the site's location outside the Settlement Boundary, as defined by Policy EP1 of the adopted Edlesborough Parish Neighbourhood Plan, carries limited weight in determining this application. The applicant attributes this to the age of

the plan and Buckinghamshire Council's inability to demonstrate a five-year housing land supply.

The Parish Council does not dispute that the Settlement Boundary may carry limited weight in the current planning context. Nevertheless, it considers that the boundary remains a relevant indication of the site's relationship with the existing built-up area. The applicant describes the site as being bounded on three and a half sides by existing development. The Parish Council's assessment is that only around 2 hectares (54% of the site) is bounded on three sides by existing built development.

3.2 Landscape character, rural character and density

The previous 64-dwelling scheme was considered uncharacteristic of the surrounding area, resulting in unacceptable urbanisation, harm to the village's rural character and adverse effects on landscape character. The surrounding area has not materially changed since that assessment, and the site remains immediately adjacent to the AAL. The Parish Council therefore considers that a scheme for 105 dwellings would intensify the effects identified in the earlier refusal.

The proposed development would have an average density of approximately 29 dwellings per hectare (dph), with densities ranging from 25 to 40 dph. By comparison, the adjacent built-up areas have an average density of approximately 13 dph, ranging from 8 to 16 dph. In the Parish Council's view, this difference demonstrates that the proposed density would be out of character with the surrounding area.

The Parish Council considers that the resulting harm to landscape character and the intrinsic rural character of this part of the village would be substantial and would outweigh the benefits of the proposal. It therefore submits that the adverse impacts would be sufficient for the presumption in favour of sustainable development (often referred to as the NPPF 'tilted balance') not to apply. The Council recognises that this is a planning judgement for the decision-maker, to be made in light of the applicable policy framework and all relevant evidence.

3.3 Sustainable travel and reliance on private cars

The site's relationship with major built-up areas has not changed since the previous application was considered. The Parish Council remains concerned that residents would be heavily reliant on private cars. A development of 105 dwellings would increase the number of journeys generated compared with the previously refused scheme.

3.4 Safe pedestrian access to village facilities

The submitted material appears to acknowledge that the site does not currently have safe and suitable pedestrian access to village facilities. Potential routes include Ford Lane and Pebblemoor (between Ford Lane and Brownlow Avenue), or Slicketts Lane. None currently has a pedestrian footway.

The applicant proposes a new footway from the development entrance along the verge of Ford Lane and then along the verge of Pebblemoor. The Parish Council has two principal concerns about this proposal.

First, the verge is too narrow in several places to accommodate a continuous 2-metre-wide footway. One constrained location is the corner at the junction of Ford Lane and Pebblemoor, where the distance between the kerb and the boundary wall is very limited. This is a location where pedestrians could be particularly vulnerable if required to step into the carriageway.

The Transport Assessment drawings appear to address this constraint by moving the kerb out by approximately 1.5 metres at the apex of the corner, to retain a 2-metre footway. However, this would reduce the kerb radius and narrow the entrance into Ford Lane, making the left turn from Pebblemoor more difficult for larger vehicles. The Parish Council is concerned that longer vehicles may consequently cut the corner and mount the kerb with their rear wheels, creating a further risk to pedestrians using the footway. The Council recommends that this geometry and its implications for pedestrian safety and vehicle tracking be demonstrated and assessed.

Second, the shortest walking route from the site to key village facilities—including the Post Office, main shops, Village Green and Community Centre/Pavilion—appears to be via Slicketts Lane rather than Pebblemoor. For example, the stated walking distance from the proposed site entrance to the Post Office via Pebblemoor, Brownlow Avenue and Brook Street is 1,264 metres. The route via Slicketts Lane, The Green and Brook Street is approximately 879 metres.

Slicketts Lane is a single-track road with no verges, and the Parish Council considers that it would be difficult to provide a safe footway along this route. The Council is therefore concerned that the proposal does not yet demonstrate a safe and convenient pedestrian route to the village's principal facilities.

The Planning Statement describes Pebblemoor as a low-speed environment with low traffic flows. The Parish Council disputes this characterisation. Pebblemoor is one of the principal routes into the village from the B440. Parish Council MVAS surveys indicate an average traffic flow of approximately 1,500 vehicles per day and an 85th-percentile speed exceeding 30 mph. These figures are broadly consistent with those reported in the submitted Transport Assessment.

Should the decision maker be minded to allow the application, the Parish Council recommends that opportunities are explored to secure wider highway and pedestrian infrastructure improvements as part of the development. For example, consideration should be given to resurfacing the section of footway opposite Tesco in conjunction with the proposed new footway works further along Pebblemoor. Delivering these

improvements alongside the development would provide a more cohesive pedestrian network and enhance accessibility and safety for both existing and future residents.

4. Other planning considerations

4.1 Housing density

The 2017 Cala Homes application proposed 64 dwellings, equivalent to approximately 17 dph. The Parish Council understands that this figure reflected the need to accommodate drainage/SUDS, highways and footways, open space and other infrastructure. The Regulation 19 draft Buckinghamshire Plan indicates potential capacity for up to 90 dwellings (approximately 25 dph). The Parish Council considers that this density is already excessive for an edge-of-settlement site, particularly when the density of the existing development immediately nearby is around 13 dph.

Although the applicant acknowledges the emerging plan's figure of 90 dwellings, the application seeks permission for 105 dwellings, equivalent to approximately 29 dph. Even if residential development on the site were accepted in principle, the Parish Council considers that the proposed density would be inappropriate and would not provide a sufficiently sensitive transition between the village and the open countryside.

4.2 Biodiversity net gain

The Biodiversity Net Gain Report indicates that it will not be possible to deliver the statutory 10% biodiversity net gain (BNG) requirement entirely on site at the proposed level of development. The Parish Council considers that on-site habitat creation and enhancement should be maximised, particularly along the edges of the site, to provide a sensitive transition between the village, the proposed development and the adjoining AAL. A substantially lower housing density scheme would possibly enable the entire BNG requirement to be met on site, which would be preferable.

4.3 Wastewater and sewerage capacity

Although the application refers to a surface-water SUDS arrangement, the Parish Council is concerned that it does not adequately address wastewater disposal and sewerage capacity.

When the village sewerage network was installed in the early 1970s, the 1972 Village Plan recorded a population of approximately 650 for the village proper, corresponding to around 250 dwellings. By the 2021 Census, the number of dwellings had increased to approximately 800. The Parish Council understands that the existing system is struggling to cope with current demand, with reported pinch points causing frequent back-ups. In the Council's view, adding 105 dwellings could exacerbate these problems for both new and existing residents unless sufficient network capacity is demonstrated and any necessary upgrades are secured.

The wastewater recycling centre (WRC) at Stanbridgeford in Bedfordshire, which serves Edlesborough, is also reported to be at capacity. The Parish Council notes that Anglian Water objected to a recent application for 24 dwellings in Edlesborough (25/01407/APP), citing a lack of capacity at the WRC to accommodate the additional flows.

The evidence base for the Regulation 19 draft Buckinghamshire Plan includes a Water Cycle Study commissioned by Buckinghamshire Council. Its summary of Anglian Water's comments on WRC capacity states:

> *"AW considers that Stanbridgeford WRC does not have capacity to serve growth. Growth in Buckinghamshire at Edlesborough for example, would require new capacity to be built so would not comply with the sustainability hierarchy."*

In light of this evidence, the Parish Council considers that the applicant's assurance that there are no insurmountable infrastructure constraints requires further substantiation. The Council asks that the applicant and relevant sewerage undertaker demonstrate how wastewater from the proposed development would be accommodated, including the timing, funding and delivery of any necessary upgrades.

4.4 Site access and carriageway width

The Transport Assessment states that the principal route through the site would have a 5.5-metre carriageway. The Parish Council considers this an appropriate width for the main internal route but questions why Ford Lane, the only access from Pebblemoor to the site, is proposed to be only 4.8 metres wide.

The Council considers that the public-road access should be capable of safely accommodating the traffic expected to use it and should be assessed in the context of the proposed internal road standard. It is unclear whether sufficient land is available within the control of the highway authority or applicant to provide a 5.5-metre carriageway together with the proposed 2-metre footway. The application should demonstrate that the access geometry, available land and pedestrian provision are feasible and safe.

Should the decision maker be minded to allow the application, the Parish Council also requests that the developer investigate potential highway improvements at the junction of Slicketts Lane and Ford Lane. Residents frequently report vehicles disregarding the existing No Entry signage and proceeding along Slicketts Lane contrary to the traffic restrictions in place. The Council is concerned that the additional traffic generated by the development may exacerbate this issue and therefore seeks appropriate mitigation measures, which may include enhanced signage, road markings, traffic-calming features, or other engineering solutions to improve compliance and road safety.

4.5 Chiltern Beechwoods Special Area of Conservation

The applicant acknowledges that the site lies within the Chiltern Beechwoods Special Area of Conservation (SAC) Zone of Influence and that mitigation through Suitable Alternative Natural Greenspace (SANG) credits would be required. The Design and Access Statement indicates that these credits would be obtained from the proposed Wards Hurst Gateway site.

The Parish Council understands that an application for the Gateway site has not yet been submitted. This creates uncertainty about the availability and timing of the proposed mitigation. In combination with the wastewater capacity concerns set out above, the Council considers that the applicant has not yet demonstrated that the required mitigation and infrastructure could be delivered in step with the proposed development.

5. Conclusion

Edlesborough Parish Council OBJECTS to application PL/26/08283/OA.

The Council considers that the proposed high-density development is inappropriate for this site. Most of the reasons for refusal of the earlier application remain relevant and, in several respects, the increased number of dwellings would intensify the concerns previously identified.

In particular, the Council considers that the proposal would cause unacceptable harm to landscape character, including the setting of the adjacent AAL, and to the intrinsic rural character of this part of Edlesborough. It also raises unresolved concerns about safe pedestrian access, reliance on private cars, the proposed density, wastewater capacity, site access and the delivery of SAC mitigation. The Council submits that the landscape and rural-character harms would outweigh the benefits of the proposal and that the decision-maker should consider carefully whether the NPPF's presumption in favour of sustainable development applies in this case.

If residential development on the site were accepted in principle, the Parish Council considers that a substantially lower density would be necessary to achieve a sensitive transition between the settlement edge and the open countryside.

Given the scale of the proposed development, the Parish Council considers that should the decision maker be minded to allow the application, it would be appropriate for the applicant to contribute towards highway improvements that address existing deficiencies and mitigate the cumulative impact of increased pedestrian and vehicular movements arising from the development. Such

measures should be secured through planning conditions or developer contributions where justified.

John Wilkinson
Councillor
On behalf of Edlesborough Parish Council