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BCC reference CM/0002/20

Proposed continuation of the use of the land as a Household Waste Recycling Site as currently consented by planning permission no. CC/3/83 at Bledlow Household Recycling Centre Wigans Lane Bledlow Ridge Bucks.

Thank you for consulting the Chilterns Conservation Board on the above application. The Board proposes to submit comments on the grounds that:

- 1.** The application before the Waste and Minerals Authority allows for a fresh 'denovo' consideration of the planning merits. Those merits must, as a starting point be based upon the high level and robust decision-making duties that apply in a nationally protected landscape. We fully accept that weight must be given to the planning history here but that any proposed continuation must be assessed against this fundamental starting point. There can be little doubt that landscape quality and scenic beauty is high and the Bucks Landscape Character Assessment denotes this character type (17) within the dipslope, with a 'Rolling and undulating topography, with steep slopes contrasting with flatter valley ridges. A smooth and sweeping landform'. Weight must be given to the importance of this nationally protected landscape in any planning determination.
- 2.** The Waste and Minerals Local Plan does not identify the Bledlow Ridge site as exceptional (as it does for High Heavens). Adopted Waste and Minerals Plan policy 22 states that Policy 22: Chilterns Area of Outstanding Natural Beauty Proposals for minerals and waste development should conserve and enhance the Chilterns AONB, comply with the prevailing AONB Management Plan and other relevant guidance, and demonstrate exceptional circumstances and that the development is in the public interest (and continues). Policy 14 also applies Development Principles for Waste Management Facilities, which adds a degree of policy sophistication that would not have applied in 1983 when the original consent was granted. We particularly focus on the AONB Management Plan 2019-2024 and particularly policy DP13 (see below). Planning weight must be given to the enhancement of the landscape and that also involves an assessment of traffic/transport and ecological matters.
- 3.** The site is sensitively located. The DEFRA Magic web resource denotes a priority habitat to the immediate east (Priority habitats and species: Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006). This envelopes the site (deciduous woodland priority habitat) and to the west a tract of ancient and semi - natural woodland lies beyond the farm. The NPPF at paragraph 174 (b) states that 'To protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'. CCB is cognisant of the planning history here

and the planning status of site. In light of a fresh application being considered it is timely that attention is paid to the enhancement of the landscape. That requires ecological assessment and an opportunity to enhance ecology around the site, allied with opportunities to reduce the concrete surfacing and site coverage. CCB would ask that the internal consultation on ecological matters be re-visited in light of the AONB duties that prevail.

4. The CCB wrote to the former operator in 2018 to draw attention to the profusion of litter spilling out from the site onto the egress and verges. This was noticeable and distracting. It is entirely possible that the operator as a community trust may take a more pro-active stance on such matters. If a consent were forthcoming then an operational management plan would be required and one drawn up with an awareness of the site's sensitivity within the AONB.

The new Chilterns AONB Management Plan 2019-2024 was adopted in February 2019 and may be a material consideration when assessing planning applications (as set out in Government's PPG para 040 on the Natural Environment). The planning objectives in the Management Plan are

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.

A number of detailed Chilterns AONB Management Plan policies are relevant to this application:

DP1 Ensure planning decisions take full account of the importance of conserving and enhancing the natural beauty of the AONB and the great weight given to its protection in the NPPF.

DP2 Reject development in the AONB unless it meets the following criteria:

- a. it is a use appropriate to its location,
- b. it is appropriate to local landscape character,
- c. it supports local distinctiveness,
- d. it respects heritage and historic landscapes,
- e. it enhances natural beauty,
- f. ecological and environmental impacts are acceptable,
- g. there are no detrimental impacts on chalk streams,
- h. there is no harm to tranquillity through the generation of noise, motion and light that spoil quiet enjoyment or disturb wildlife, and
- i. there are no negative cumulative effects, including 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.

DP8 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 for intrinsically dark zones. Avoid architectural designs that spill light out of large areas of glazing.

DP10 Make sure that all development that is permitted in the AONB or affecting its setting delivers a net gain for the Chilterns by (a). on-site improvements for biodiversity, landscape, the rights of way network, AONB visitor facilities, and/or (b) b. financial contributions, secured through s1065, CIL, or offsetting schemes, towards wider green infrastructure projects that enhance the AONB by meeting the aims of this AONB Management Plan.

DP13 Support opportunities for enhancing the AONB by removing derelict or detracting developments and infrastructure. There are some places in the AONB where buildings and structures like pylons, rail gantries, telecoms masts, television masts, waste sites, minerals sites, and farm infrastructure have scarred the beauty of the Chilterns. The removal of unsightly structures can help restore beauty and rural character. Infrastructure providers should remove all redundant masts and equipment. We welcome continued investment in undergrounding overhead electricity lines in the AONB and recommend that that all new supplies should be undergrounded unless there are ecological or archaeological constraints to this.

The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. 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).

The Chilterns Conservation Board is a body that represents the interests of all those people that live in and enjoy the Chilterns AONB. It is made up of representatives nominated by the organisations listed in Appendix 1.

In summary here, CCB accepts that the planning history of the site must be taken into account but that a fresh *denovo* consideration of the planning merits affords an opportunity to reappraise the delivery of adopted Waste and Minerals Local Plan Policy 22. This requires a review of traffic/transport, ecological and landscape matters to seek site improvements. We identify the potential for ecological improvements and a management regime that will be sensitive to the nationally protected landscape within which this use is located. Further, Policy 14 of the Waste and Minerals Local Plan also indicates a much more sophisticated policy approach than would have applied when this use was first approved in 1983. In light of the important tests in section 85 of the CROW Act 2000 and the NPPF at 172, CCB has concluded that a real and meaningful opportunity exists to enact enhancements in the consideration of this application.

For and on behalf of the Chilterns Conservation Board