

Billed as a “continuation” and “like for like”, effectively Circumventing safeguards afforded, by up to date surveys.

The Application has evaded normal scrutiny and common sense due diligence.

- a. Both traffic and environmental surveys have been waived on the grounds that there would be no change in operation. This is wrong: introducing charging is a very substantial change that will increase peak time queuing and collision risks.
- b. The 1983 permission was expressly termed to allow for council review in the light of traffic development over the years. There is no evidence of this ever having been done. Suffice it to say that 93,000 vehicles did not use the site in 1984. In addition, the 1983 permission required a visual splay of 150 metres. Although this appears to be well below the normal 215 metres required for rural roads applying the national speed limit (which has increased since 1983), even this is not met.
- c. It also ignores the need for clarity on asbestos in the old landfill and possible deterioration of the site over time. DENHAM Parish was in the press recently regarding methane emissions and children suffering from headaches.

Before closing, the waste site had operated for 36 years. Before then, it was a landfill site that accepted a range of hazardous waste. The site is surrounded by bore holes to assess the methane risk and contamination.

The site is located off a main road, beneath the summit of the Chiltern Ridge. It is also on the National Cycle Route. The local parish council raised concerns about the traffic and its minutes report that the applicant said a traffic survey would be undertaken to assess this. From the minutes of BcSPC, August 2019, Cllr B. Bendyshe-Brown: “when the application is made, a Public Consultation Vehicle Survey will be undertaken”. In an email to the CIC’s agent inquiring on behalf of the Planning Officer, 17/2/2020 he denied this undertaking saying: “There was never any commitment on my behalf to conduct a traffic survey”.

The Chilterns Conservation Board that has a statutory duty to manage the AONB and to advise on planning identifies that the site is sensitively located with a priority habitat that envelopes the site with a tract of ancient and semi - natural woodland nearby.

It says that this “*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.*”

The Board also suggested that:

“Planning weight must be given to the enhancement of the landscape and that also involves an assessment of traffic/transport and ecological matters.”

See the Chiltern Conservation Board submission (Number 13)

The site is also in the buffer zone for the nearby Lodge Hill SSI. It also sits on a significant water aquifer. For a detailed analysis see a note from an environmental expert here, 30 November 2020, public comment: [<https://publicaccess.buckscc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=Q4EGSEDS03F00>].

Despite all of this and the Chilterns Conservation Board recommending ecology and traffic surveys, including surveys reported as being promised by the applicant, none have been carried out.

Why is this?