Bledlow-cum-Saunderton Neighbourhood Development Plan

Report of the South Saunderton Task Group

1. Introduction

- 1.1 The South Saunderton Task Group (SSTG) was set up by the Bledlow-cum-Saunderton Neighbourhood Plan Working Group (WG) in December 2015. Its initial work programme was focused around the following questions¹:
 - How can the development of the former Molins site contribute to meeting local housing and other non-residential needs whilst minimising its impact on the Green Belt/AONB and local traffic?
 - How can the combined development of the former Molins, West Yard and Coal Yard sites contribute to creating a sustainable long term solution for the Saunderton Station area?
- 1.2 Through the SSTG's work it became clear that the Neighbourhood Development Plan (NP) would not be able to influence the extant permission for West Yard. In December 2015 outline planning permission was submitted for the re-development of Searl's Coalyard. This application will be decided prior to the plan being made and it was agreed that the work of the SSTG would not be able to influence these developments and that therefore the SSTG should not consider these sites in its remit.
- 1.3 Following a re-scoping of the remit of the Housing Development Task Group (HDTG) by the WG the geographical scope of the HDTG was widened to include the Green Belt and AONB area of the parish. This has resulted in the HDTG bringing forward proposals for a settlement boundary for South Saunderton. This was done in Consultation with the SSTG and this proposal is fully supported by the SSTG.
- 1.4 The SSTG was composed of local residents all of whom, by virtue of being either long-standing residents of the Ward, or through their specific interest in the planning context of the former Molins factory site, demonstrated a competency to undertake the work of the SSTG.
- 1.5 The following stakeholders have been engaged with by the Task Group:
 - Saunderton Vale Management Company
 - Saunderton Station Rail Users Group (via Adrian Honeybill)
- 1.6 This report contains the SSTG's recommendations to the WG on South Saunderton for the Bledlow-cum-Saunderton Neighbourhood Plan.

2. Background: Landscape and historic settlement context.

- 2.1 South Saunderton is defined as the area of Saunderton Ward within the HP14 postcode area. Geographically this includes the "tail" of the Saunderton Ward to the south of Haw Lane, encompassing the former Molins factory site, the residential and business developments in the area around Saunderton railway station, the Golden Cross PH and the Clare Charity Foundation.
- 2.2 South Saunderton is located in the Wye Chalk River Valley². This comprises two parallel dry chalk valleys which converge south of the area below West Wycombe Hill from where the River Wye

¹Bledlow-cum-Saunderton Neighbourhood Plan, Task Group Structure and Scope. http://www.bledlow-cumsaundertonparishcouncil.org.uk/wp-content/uploads/2015/10/15-12-15-Task-Groups-ToR.docx

² http://www.buckscc.gov.uk/media/1997190/134-LCA-Wye-Chalk-River-Valley.pdf

rises and flows into High Wycombe. The valleys lie either side of the predominantly wooded ridgeline which extends from West Wycombe Hill to Slough Hill, beyond here they merge again to form a broad valley landform transitional with the Chilterns escarpment foothills. Valley slopes are predominantly arable farmland which extends down into the valley bottoms, interspersed in places with pasture grassland. Ancient woodland on the valley tops and central ridgeline with pockets of chalk grassland on upper valley slopes contribute to biodiversity value. Views to the escarpments are afforded from South Saunderton with views to the historic village of Bradenham from Slough Hill. A strong time depth is evident from the Scheduled Ancient Monuments of the Saunderton Lee Bronze Age Barrow Cemetery and Grim's Ditch (which forms the southern boundary of the South Saunderton area). The landscape retains a rural character. The A4010 and railway line connecting High Wycombe to Princes Risborough run north-south through this landscape.

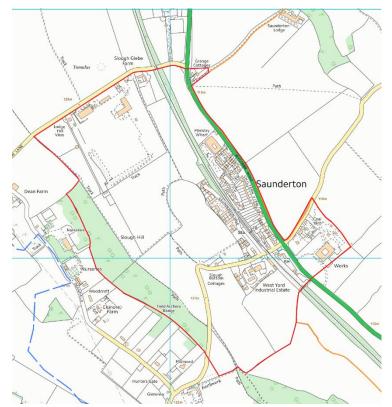


Fig 1: South Saunderton area.

2.3 Historically the settlement pattern of the area is one of scattered farmsteads and dispersed individual properties. This pattern continued following the development of the railway line during the 19th century and the only large scale development in the area prior to the 20th century was the development of the Wycombe Union Workhouse on the site now occupied by the Clare Charity Foundation.

3 Background: Modern development and planning context.

3.1 With the exception of a few isolated houses most of the development in the South Saunderton area has occurred during the 20th century. Whilst most of these relatively small former industrial/employment sites have now been converted into housing, the former Molins site is prominent within Wycombe District as a large brownfield site in the Green Belt remote from basic facilities which could support a large scale residential development.

- Hillview. The houses that are now Hillview occupy what has previously been Saunderton Carriage Company motor sales and repairs (circa 1983.), Saunderton Garage (circa 1980) and Saunderton Service station with pumps and small shop (circa 1960s).
- Saunderton Vale. Formerly Anderson Strathclyde, circa 1936-1980s, once a major employer in Saunderton (now 57 houses).
- West Yard, Saunderton. 20+ light industrial units closed 2014. Permission granted for development of 42 homes. (Marked **4.** on Fig 3.)
- J.B. Searl & Son Coal Merchants, Saunderton. c.2013 now the subject of a Planning Application for redevelopment with 5 homes (Marked **3.** on Fig 3.)
- Ministry Wharf, Saunderton. Prior to the building of office and industrial units (circa 1980's) this was a large Ministry emergency storage unit, mostly for flour and grain.
- Clare Foundation/Saunderton Estate. Ortho was a very large employer, now offices of the Clare Foundation with many fewer employees and focusing as a Charity business hub. In the interim this was occupied by Janssen Cilag, a pharmaceutical company. Bucks Business First is also based here.

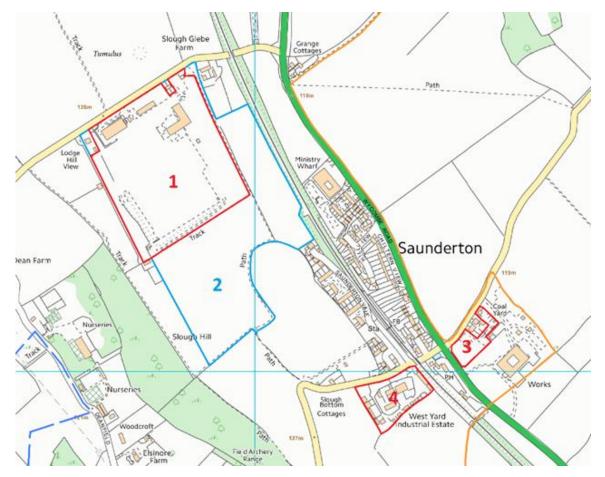


Figure 2: Current planning context. (1. Molins former factory site (15/05250/OUTEA) Appeal with PINS for 212 houses. **2.** ERLP/St. Congar ownership. Undeveloped Green Belt land. **3.** Searl's Coal Yard. (15/08368/OUT) outline planning application for 5 houses. **4.** West Yard. (14/05870/FUL) Permission granted for clearance of industrial units and development of 42 houses.

3.2 Former Molins Factory site (marked 1 and 2 on Fig. 2) – It is understood that the site was originally developed for weapons manufacture during World War II. c. 1950 Molins opened a 'new major factory' in Saunderton. From 1950 to 2008 the site was owned and operated by Molins, a producer of cigarette manufacturing and packaging machines. From about 2005 the site was subdivided and let as a mix of office and light industrial accommodation. In 2007 following the loss of a major tenant, Molins put the site up for sale. It was purchased in 2008 by e-Shelter a German internet datacentre company and planning permission granted for a data centre which was sensitively designed with sedum roofs to have a low visual impact. In 2009 the main factory was demolished leaving two buildings standing totalling about 2,500m² which remain today. Following changes in the data centre market the site was deemed no longer viable as a data centre and in January 2014 the site was bought by English Residential Land Partnership (ERLP) a property management fund for £7m.



Fig 3. South Saunderton area c. 1951 and 1953 showing the development of the Molins factory site³⁴

During 2015:

- **February** St Congar Ltd applied for planning permission for an urban style housing estate development of **212 houses** on behalf of ERLP. The application drew a large number of responses from local residents as well as from local and national conservation bodies all of whom were very strongly opposed to the scale and nature of the proposed development within the AONB and Green Belt.
- Wycombe District Council (WDC) proposed an *Area Action Plan* to explore the viability of a more sustainable 'Greater Saunderton' of 800 1,000 houses able to support a local shop and perhaps a school.
- August WDC published the Parish Council's intent to develop a Neighbourhood Plan.
- September St Congar Ltd appealed to the Planning Inspector on the basis of nondetermination.
- In **December** WDC's Improvement and Review Commission recommended the Area Action Plan be dropped in favour of the Neighbourhood Plan.
- **December** WDC Planning Committee resolved that they were minded to refuse St Congar Ltd's application.

³ http://www.britainfromabove.org.uk/image/EAW036641

⁴ http://www.britainfromabove.org.uk/image/EAW052351

September 2016 Appeal expected to be heard by the Planning Inspectorate. WDC have published their reasons for being minded to refuse and the grounds on which they will contest the appeal.

- 1) The development would have a greater impact on the openness of the Green Belt than the *existing development*, or the approved data centre development.
- 2) The proposal represents Major Development in the Chilterns Area of Outstanding Natural Beauty. The applicant has failed to demonstrate that there are exceptional circumstances to justify that this development would be in the public interest.
- 3) The proposal fails to conserve the landscape and natural beauty in this Chilterns AONB. It fails to protect the rural character of this part of the District and fails to respect the character and sense of place of villages and hamlets and the setting of this part of the AONB.
- 4) The planning application contains very limited information relating to the appearance of the dwellings ... approval of general layout and quantum of development [without this information] at this stage would constrain design decisions ... to the extent that it would not be possible to deliver a development which would respond acceptably to the Chilterns AONB.
- 5) The site is located in an area where the need to travel will be maximised due to the lack of local facilities but the site lacks suitable access to attractive, frequent and convenient non-car modes of travel ... it is likely to be reliant on the use of the private car contrary to local and national transport policy.
- 6) The proposal represents a poor standard of place shaping and urban design. This is principally the result of the site's isolation from Saunderton; its single land use character; the general lack of car parking within the site including visitor car parking; the way the car parking has been provided; the limited opportunity to park within the street; the narrowness of some streets with insufficient provision for turning; the loss of the ballroom building and the proposed flat building and car parking serving it.
- 7) The absence of a legal agreement to secure the provision and maintenance of public open space and other land in the applicant's ownership; the management and maintenance of SUDS [sustainable drainage]; the provision of a Travel Plan for future residents; and a financial contribution towards education.
- 8) The development fails to make adequate provision for affordable housing.
- 3.3 Once WDC had clarified the position they would take in the forthcoming appeal they made it clear to the Neighbourhood Plan WG that in developing policies that seek to influence the development of the Molins site in the Neighbourhood Plan the WG would need to be mindful of putting forward proposals that would be contrary to WDC's appeal position, as given above, as this would risk prejudicing their case and they would not be able to support such policies at the formal Consultation stage.
- 3.4 Whilst the WG are fully supportive of WDC's Reasons for Refusal the first point of WDC's position presents a significant limit to the scale of development that could be delivered on the Molins site and is at odds with the ambitions of residents identified in the Parish Survey, albeit undertaken prior to public knowledge of WDC's appeal position, and the subsequent Consultation responses (see 4.2 to 4.4).
- 3.5 As a consequence of WDC's guidance the Neighbourhood Plan WG sought their own legal advice in order to give clarity to the courses of action open to the WG. The advice the WG received

confirmed that with regards the first of WDC's reasons for refusal the reasoning is valid and that the construction of new buildings is inappropriate Green Belt development unless it falls into one of the NPPF paragraph 89 exceptions, the relevant one being that *"the partial or complete redevelopment of previously developed sites ... whether redundant or in continuing use ... which would not have a greater impact on the openness of the Green Belt than the <u>existing development</u>". This requires <i>prima facie* a comparison between the built form and volume of that which is proposed against what is on the site now.

3.6 However even if the Parish Council were to formulate Neighbourhood Plan policies supporting a greater quantum of development on the site, as is its right under the principles of the Localism Act 2011, any such proposals would be given limited weight by the Inspector at such an early stage of the Plan making process, and that therefore the Parish Council could continue its work to develop the Neighbourhood Plan without fear of prejudicing WDC's case at the appeal.

4 Background: Parish Survey and Community Consultation.

- 4.1 As part of the Parish Survey residents were asked a number of questions with regards to the Molins site. It should be borne in mind that the responses to the Parish Survey were given prior to residents having an understanding that WDC would only support development that had no greater impact on the openness of the Green Belt than the *existing development*.
- 4.2 **Question 6** of the Parish Survey asked residents: "What sort of development do you want to see at the former Molins Site?" Out of 360 responses 256 indicated a preference for a mixed use development, 54 preferring it remain in employment use, and the remaining 44 respondents indicating that it should be used solely for residential development.
- 4.3 Question 7 asked those who had indicated a preference for an employment or mixed use in question 6 to indicate what types of use should be included in the mix. Housing and office space were priorities for these respondents closely followed by using the site for a retirement village, light industrial and community space (although only 117 people thought it was appropriate for the development of a "village hall"). Other suggestions included; village shops, schools, doctors/medical centre, care home, film location, café/coffee shop, solar farm, post office, handicraft centre, theatre, hotel, skate-park, supermarket, library, car parking for Saunderton station, park or walking area.

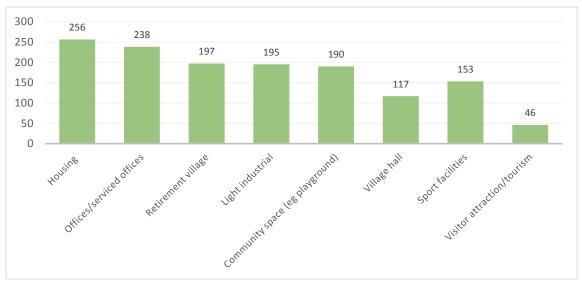


Fig 4: Responses to Question 7: "If you answered "Employment" or "Mixed use", which of the following would you like to see? (Tick all that apply)"

4.4 Using the results from the survey and with input from WDC the SSTG worked with rCOH, the NP planning consultants, to prepare a 'visual concept' of what a mixed use scheme might look like whilst not giving an indication of quantum. At the two Community Consultation events this was presented alongside summaries of the St. Congar proposals and the WDC appeal position. The two Community Consultation events provided the first opportunity for the NP team to outline the WDC position. When given this information a significant proportion of the respondents indicated that they preferred the WDC option for minimal development on the site. The public were asked to indicate which of the schemes they preferred.

Option A - St. Congar Proposals	Option B - WDC position " <i>no</i> greater than existing development"	Option C - Visual concept of mixed-use scheme.	Other / None
0	34	47	3

Fig 5: Consultation preferences indicated by respondents to the options presented by the SSTG.

- 4.5 The Parish Survey also asked people if they thought that the former Molins site should have a direct pedestrian link with Saunderton station. 285 people (79%) thought that it should whilst 54 (15%) of respondents did not. It was generally felt that such a link would reduce car based commuting from the site and alleviate car parking congestion at Saunderton station. It was felt that without such a link any development, whatever its size, would be disconnected from the neighbouring communities but there were concerns over how it would be maintained and over how it would be lit in the AONB. A significant number of responses indicated it should be suitable for cycling as well as walking. There was significant concern that a pedestrian link via the Haw Lane railway bridge would be dangerous and increase congestion at the A4010/Haw Lane junction. A minority of respondents were concerned that a link would not be used, would suffer from a lack of maintenance and would be a security concern.
- 4.6 A range of concerns about the Molins site were expressed in the Consultation feedback; that the WDC position was not deliverable; that 25 houses on an isolated site was not sustainable development and therefore the focus should be on a business use; that there was no evidence that there was a need for additional business space in the area; that the site was isolated from other facilities and was not appropriate for a retirement village; that there should be no street lighting; that the site needed linking with Saunderton and that any development should minimise the impact on traffic, the AONB and neighbouring properties. Several people qualified their support for a larger development with it needing to deliver a tangible benefit for the wider community. The Consultation responses also demonstrated that there remains some misunderstanding of the situation with some commenting that the WDC would result in 25 large "stock-broker belt" houses

5 Evidence: Mixed Use Development

5.1 The Parish Survey and subsequent Community Consultation events revealed that there is support amongst local residents for the Molins site to be used for a mixed development. When asked what sort of development they would like to see, the top 5 responses from residents were Housing (71%), Offices/Serviced Offices (66%), Retirement Village (55%), Light Industrial (54%) and Community Space (e.g. playground) (53%). While the Working Group and Parish Council will need to balance the response from residents against the planning constraints for the Molins site

the SSTG have a duty to investigate the evidence base for the preferred uses indicated by residents.

6. Evidence: Business and Employment Uses

- 6.1 The community is worried by the loss of and lack of local/rural businesses and employment opportunities within the villages. There is still the need in the rural area for small numbers of B1 business units of varying size from around 150m² to 500m², as supported by paragraph 9.47 of the Buckinghamshire Housing and Employment Development Needs Assessment (HEDNA), following the closure of West Yard leading to the displacement of existing business occupiers⁵. This would ideally suit starter businesses in high tech or light industrial occupations. Offices/serviced offices & light industrial units were strongly supported in the survey as the type of employment that would be acceptable for the site.
- 6.2 In considering the inclusion of any new business units within the South Saunderton area there is the need to consider the Parish as a whole, and the balance of businesses and developable land use within it. Many changes have occurred to reduce or create a change of building use from agricultural/forestry to residential, or through farm diversification, to offices. The loss of major employment sites (West Yard and the Saunderton Carriage Company in particular) to housing has further reduced the viability and sustainability of the local economy in this rural area. This is evidenced by:
 - BcSNP Strategic Environmental Assessment / Sustainability Appraisal letter 29 February 2010 A3
 - Rural Economy and Environment Task Group (REETG), BcSNP Presentation: Indicative Land Use by Sector in the Parish
 - REETG, BcSNP Presentation: Three Business Types A complex picture
 - REETG, BcSNP Presentation: Impact & Outputs
 - WDC Economy Study & Employment Land Review, Peter Brett Associates January 2014.
- 6.3 The Molins site is set in an area between South Saunderton and Bledlow Ridge, with Saunderton Station a potentially short walk away providing access to a rail link to Princes Risborough, High Wycombe, London (Marylebone), Oxford and other major cities beyond.
- 6.4 The following is a list of known employment sites in addition to those listed in paragraph 3.1 that have been converted to housing over the last thirty years or so. It evidences a gradual decline in local employment opportunities.
 - Bledlow Ridge Garage closed c. 2012. Now housing.
 - Bledlow Ridge Post Office. Closed c.2000.
 - *Bird & Tole*, Bledlow Ridge. Light engineering works closed c.2008.
 - The Chiltern Hotel (formerly the Crown), Saunderton. Hotel closed 2013 and now housing.

6.5 List of current employment and change of use sites:

- Crownfield, 6 x B1 light industrial units
- *Ministry Wharf*, Saunderton. Prior to the building of office and industrial units (circa 1980's) this was a large Ministry emergency storage unit, mostly for flour and grain.

⁵ Buckinghamshire Housing and Economic Development Needs Assessment. January 2016. Pg. 179

- *Clare Foundation*. Formerly Ortho, a very large employer, then occupied by Janssen Cilag a pharmaceutical company. Now offices of the Clare Foundation with many fewer employees and operating as a Charity business hub. Bucks Business First is also based here.
- Other Agricultural Buildings/Farm diversification. A number of farms have opened farm shops or sell their own product e.g. Pickles Farm, Lee Road; Hinton Crossing Beef. Some have changed to light industrial use e.g. vehicle repairs on Lee Road
- Forty Green Farm. Approx. 6 office units opened c. 2005. Change of use from farm buildings.
- *Parslow Apiaries*, Bledlow. One small light industrial unit on West Lane Bledlow, c. 2013. A change of use from derelict farm buildings.
- *Manor Farm,* Bledlow. One office for Carington Estate c. 2010. Change of use from farm buildings.
- 6.6 Rural businesses are proven to be beneficial to the economy, and cumulatively are a major source of both employment and as a significant contributor to the GDP of the South East. In England 9.3 million people live in rural areas. Virtually all Planning policies impact upon rural communities and the concept of 'rural proofing' helps achieve good economic, environmental and social solutions that contribute to growth. The latest government Consultation⁶ states that the needs and interests of rural people, communities and businesses in England need to be properly considered in Planning terms, especially in the area of rural business growth.
- 6.7 The loss of Employment space to C3 housing over about the past two decades in the area around Wycombe has been partly due to the much higher development values of C3 housing land⁷ (See Appendix 01 for detail), and not due to a reduction in the need for employment floor space. What is not forecast is the extent by which further loss of employment sites to housing will lead to other employment sites needing to be replaced.
- 6.8 The Government is now committed to protecting the balance of business units to housing in rural areas, in order to incrementally grow and sustain economic viability of rural areas, and particularly for those who choose to live and work in a rural setting. It must be remembered here that the main legal and social objective of land use Planning is to 'create a close correlation between homes, jobs and infrastructure'. In fact, until some years ago, Buckinghamshire published and maintained an overall Planning strategy, with this as its core objective.
- 6.9 The natural environment that exists around the Molins site is a key element to attract high tech companies and new enterprises. The rural areas currently lack early stage business accommodation for innovative companies in research & development, technologies including micro-electronics and screen based industries. Early stage business in these emerging markets employ highly skilled people who are attracted to live and work in a stimulating rural setting allowing them to achieve their business aspirations and for creativity and innovation whilst benefitting and addressing, in a viable and sustainable way, the future local economic needs of rural areas.
- 6.10 There is a demand for small B1 business units, as demonstrated by current occupation rates at Ministry Wharf, and research shows that this demand will continue through to 2030. The Government is keen that rural businesses should have the same opportunities as those in towns and cities. It is recognised that further loss of employment sites such as West Yard will continue, with the displacement of existing businesses requiring replacement premises.⁸

⁶ Press release – Boosting productivity in rural areas - Department for Communities and Local Govt, February 2016

⁷ Wycombe District Council 2015, Viability Assessment: Final Report p16 – p17.

⁸ Buckinghamshire Housing and Economic Development Needs Assessment. January 2016. Pg. 176, Figs 131,

^{132 &}amp; pg. 112, Fig 82, pg. 179 point 9.44

- 6.11 According to Government research there are more businesses per head operating in rural areas, indicating that smaller businesses operate in this environment to a greater extent than in urban areas.⁹
- 6.12 Buckinghamshire and Thames Valley Local Enterprise Partnership (BTVLEP) believes there is a strong business case to establish more hatchery/incubation/business centre facilities in Buckinghamshire. Providing businesses with a safe, supportive environment in which to grow will with access to peer-to-peer mentoring support, advice and finance accelerate their development path¹⁰.

7 Evidence: Retirement Village

7.1 As part of the Parish Survey residents were asked what types of housing should be prioritised on suitable sites. The following categories were given medium to high priority; 3 bedroom houses (72%), 2 bedroom houses (69%), properties designed for the elderly (63%), affordable housing for letting or shared ownership only by those with a local connection (62%) and sheltered accommodation for the elderly/care homes (55%).

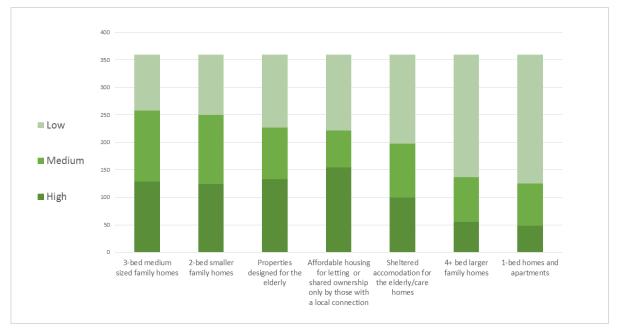


Fig 6: Types of development prioritised by residents for suitable sites.

7.2 With the exception of the affordable housing priority, the other 4 of the top 5 priorities would be suitable for the people of retirement age looking to downsize or move to more age-related accommodation. The development of houses for the elderly or retired should be treated as a fairly high priority behind the higher priority 3 and 2 bedroom houses and affordable homes. On the former Molins site a portion of the site could be developed as a 'retirement village' or an area suitable for elderly people.

⁹www.gov.uk/government/uploads/system/uploads/attachment_data/file/399186/Businesses_January_2015. pdf pp. 1, 6 & 7

¹⁰ Buckinghamshire Thames Valley Local Economic Partnership, *Plan for Sustainable Economic Growth 2012 – 2031*. Pg. 13. Point 6.19

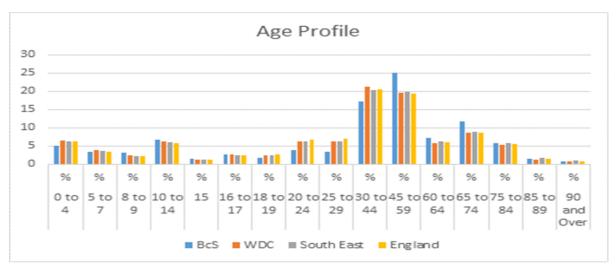


Fig 7. Age distribution of parish residents from the census 2011

- 7.3 The age demographic for the parish compared with the Wycombe district, S.E England and England as a whole shows the parish has a higher percentage of people in the 45 to 74 year old bracket and a lower percentage between the ages of 20 and 44 (Figure 2). With larger than average homes in the Parish (See Fig A, Appendix 02) this creates a bottleneck for people in their sixties and seventies who wish to downsize to more manageable properties.
- 7.4 From Fig 7 it can be seen that the percentage of the parish population aged 60 plus is 26.9% compared to 21.6% for Wycombe District. That is equivalent to an additional 131 people aged 60 plus based on the parish population of 2469 compared with Wycombe District age profile.
- 7.5 The percentage of the parish population in the age band 45 to 59 is 25.0% compared to 19.6% for Wycombe District demonstrating that the Parish population will have an even greater proportion of 60 plus over the next 10 to 15 years compared to the wider District. The result of this would be an equivalent of up to an additional 265 people aged 60 plus based on the parish's current population compared with the Wycombe District age profile at that time (assuming future deaths come mainly from the 75 plus band).
- 7.6 According to the HEDNA¹¹ in the period 2013-2033, Wycombe District population will grow from 173,834 to between 193,167 and 194,659. This is a growth of approximately 20,000 people. The population in the aged 60+ group will grow from 38,627 by 16,400 to approximately 55,000, whereas the population aged under 60 will grow by only 3,600. This is a move in the percentage of those aged 60+ from 22.2% of the population to 28.4% for Wycombe District by 2033.

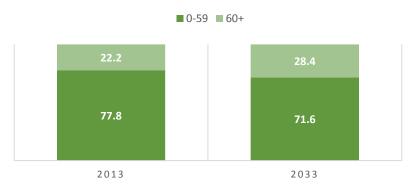


Fig 8: Wycombe District Population 2013-33: an ageing demographic

¹¹ Buckinghamshire Housing and Economic Development Needs Assessment, January 2015 p72

- 7.7 Future population growth data is not available at a level below the district level, however as the parish age groups of 45-59 and 60 plus are currently 5.4% and 5.3% higher than Wycombe District, it is likely that the parish population aged 60 plus will remain higher than that for Wycombe District as a whole, and represent around 33.8% of the parish population by 2033. There will be a need to ensure more suitable property is available to meet this age group's requirements in the future. The Parish Survey response for housing for the elderly is in line with the Parish's need for dwellings for the 60 plus.
- 7.8 The general health of the Parish compares favourably compared with Wycombe District South East England and England as a whole. 87% of the parish population considered themselves in very good or good health.

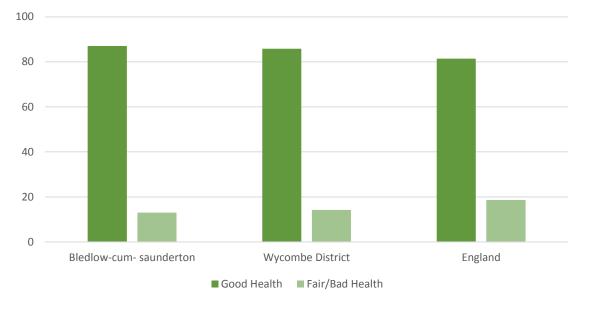


Fig 9: General health as per 2011 census.

- 7.9 The number of parishioners providing unpaid care is in line with Wycombe District and the rest of England at 10% of the population. The 2011 census does not capture where the unpaid care is performed so it is difficult to draw many conclusions from the data. The general health data is probably a better indicator of the parish's need for homes for the elderly/infirm and this would indicate that the parish's need for caring facilities is below average for the District but the need is still there.
- 7.10 The Bucks HEDNA 2015 Section 8 "Housing Requirements Older people in the period 2013-2033" refers to the 2012 *Housing Our Ageing Population* report (HAPPI2) and uses its definition for specialist provision for the elderly. The Extra Care, Sheltered 'plus'/Enhanced Sheltered and dementia requirements for Wycombe District are approximately 7% of the age group 75 plus. The parish population of 75 + is 199 people. This implies that the parish may need 14 places across 3 different types of elderly care currently which might grow by 4 places over the future years.
- 7.11 The 2012 *Housing Our Ageing Population* report (HAPPI2) suggests that this type of housing should:

"... be located in an area which constitutes a Lifetime Neighbourhood in terms of accessibility to transport, retail and other amenities and facilities that older people need..." and that "...would help local authorities interpret the National Policy Planning Framework (NNPF) and help them specify the desirable housing mix in their planning briefs for sites in their areas...".

This would not appear to be supportive of using the former Molins site for Extra Care, Sheltered 'plus'/Enhanced Sheltered or dementia care purposes.

- 7.12 Section 8 of the draft Bucks HEDNA 2015 highlights the need for Leasehold Schemes for the elderly. These are purpose-built apartments, specifically designed to meet the needs of older people, and intended to provide the leaseholder with low-cost accommodation and a totally independent life style. It is recognised that older people, particularly owner-occupiers, sometimes find it difficult to meet the running costs of their existing homes, and to properly maintain both the property and its grounds. These are often provided by Housing Associations and not-for-profit organisations. There is a requirement for Leasehold Schemes for the elderly in Wycombe District of 12% of the age group 75 plus. With a parish population of 199, this would imply a need of 24 places within the parish.
- 7.13 According to the BUCKS ACORN (A Classification Of Residential Neighbourhoods) (May 2009), Bledlow-cum-Saunderton Parish is classified as a 'Wealthy Mature professionals' "the household income of this group is extremely high and people from this group live in the very least deprived areas of Buckinghamshire and England". The above data is also supported by further analysis included as Appendix 02 of this report. This would suggest that the demand for a Leasehold Scheme for the elderly is more likely satisfied through a Retirement Village approach in this Parish.
- 7.14 Retirement villages are developments built especially for older people. They will often have properties of different types houses, bungalows and apartments and they are often located in attractive rural settings. Most Retirement Villages promote a luxury lifestyle, offering a variety of leisure facilities, such as clubhouses, swimming pools, spas, restaurants and bars, plus a range of social activities. The majority of properties in Retirement Villages are designed for independent living, but some offer care and support for those that need it. This might be in assisted living apartments or onsite care services that can provide home help or personal care. They offer older people an attractive combination of independence and security, as well as opportunities for social engagement and an active life. It would also allow local parishioners the chance to remain in the parish and maintain their existing social life and networks. Some of the leisure facilities, that they may provide, could also be made available for wider community use such as a clubhouse doubling up as a village hall for South Saunderton.
- 7.15 Retirement villages offer many advantages to health providers. For instance, residents are not dispersed in the wider community, so time and resources are saved if, for example, general practitioners, community nurses and other community-based health and social care professionals can visit more than one patient in one place.
- 7.16 By their nature, retirement villages have a lower traffic generation than other types of residential property, and travel in the peak hours is also lower (see Appendix 03). This is because the traffic generation of standard residential properties is in large part determined by the need to travel for employment and education (that is, travel to work and the 'school run') and these journeys generally need to be made in the early morning and late afternoon. Residents in retirement villages do not need to undertake employment and education travel, and typically also have greater discretion to make trips for other purposes at different times of the day.

8 Evidence: Residential Development and Design

- 8.1 Extensive data and recommendations on Residential Development within Bledlow cum Saunderton has been compiled by the Housing Development Task Group (HDTG) and their evidence base and recommendations should be considered as a supplemental and supporting document into this report's evidence and recommendations on residential development in the South Saunderton area.
- 8.2 The South Saunderton area has the following residential scheme completions since 2003:
 - 2005 Demolition/New 1 scheme, 15 houses.
 - 2015 Demolition/New 1 scheme, 1 house.

This relatively small number is reflective of South Saunderton's location within the Green Belt.

- 8.3 Of the unimplemented schemes in South Saunderton, the West Yard Industrial Estate will provide one of the biggest developments on record, with the demolition of all current buildings and erection of 42 residential dwellings, public space, play space and landscaping. Construction is due to start in mid-2016.
- 8.4 As evidenced by Paragraph 3.1 of this document most of the residential development in the South Saunderton area has been driven by the redevelopment of brownfield/employment sites. It has already been established in this document (Section 3 Background: Modern Development and Planning Context) that the redevelopment of the Molins site for residential development is acceptable in principle provided it does not have a greater impact on the openness of the Green Belt.
- 8.5 The evidence laid out in paragraphs 8 to 14 of the HDTG report outlines the evidence that supports the recommendations made at the end of this report with regards to development within South Saunderton:
 - Paragraphs 8 & 9 and figures 2 & 3 evidence the need to prioritise 2 3 bed housing in order to provide opportunities for local residents to downsize and to provide more suitably priced housing for those seeking to access the housing market in the parish.
 - Paragraph 12 outlines the results of the Parish Survey which highlighted:
 - a) The desire of local residents to protect the quality of the built environment by ensuring that business and residential development is in harmony with the rural character of the Parish and sits well in the landscape; defining and preserving the boundaries of our villages and hamlets and promoting a high level of energy conservation/environmental sustainability in new buildings.
 - b) That by applying a simple weighting factor to the responses to question 5, the above results clearly show an equal preference for the development of 3 bedroom, affordable housing and 2 bedroom homes, followed by sheltered accommodation and properties designed for the elderly. 4 bedroom and 1 bedroom developments do not seem to be a priority.
 - c) In protecting the quality of the natural environment priority should be given to; protecting the views of and from the Chilterns AONB from inappropriate development; minimising noise and other forms of pollution and minimising light pollution by supporting a 'dark skies' policy.
- 8.6 In addition to the priorities for the protection of the natural and built environment highlighted in the Parish Survey report and the HDTG Report, South Saunderton lies in the Wye Valley Landscape Character Area. The following priorities have been identified for this area in terms of landscape protection:
 - Conserve and appropriately manage chalk grassland on the dry valley slopes to encourage chalk grassland species. Support and promote expansion and connection of chalk grassland areas.

- Conserve and manage tree and woodland cover, notably on higher ground to maintain visual containment and promote biodiversity value.
- Manage and gap up hedgerow boundaries to provide visual unity and biodiversity value. Coaxial fields, assarts and pre 18th century irregular enclosures are a priority for conservation, restoration and enhancement.
- Conserve the mosaic of land use and land cover within the valley. Maintain the contrast between the smooth valley sides and wooded slopes/tops. Promote appropriate management of farmland, to encourage and create more biodiverse habitats, as well as agriculturally productive landscapes.
- Conserve the character, fabric and appearance of historic buildings, in villages and hamlets and individual farmsteads. Prevent inappropriate new development which would compromise the intactness of historic villages such as Bradenham and West Wycombe or further extend settlement into the rural landscape.
- Maintain the rural character of the roads which cut through the western valley, and up valley sides avoiding widening and suburbanisation.
- Conserve archaeological sites/monuments and their setting, which provide evidence of past use of the land.
- Maintain key views in the landscape to the mausoleum and church on West Wycombe Hill and to the chalk escarpment to the north.
- Seek to limit further encroachment of the suburban edge of High Wycombe including signage along the A4010 and A40. Seek to de-clutter the junction between the A40 and A4010 where appropriate.

Because of its prominent position within the Landscape Character Area the above priorities should be given consideration with the policies developed for the Molins site.

9 Recommendations

- 9.1 To provide sustainable growth and an expansion of all types of businesses and local enterprise in rural areas, both through the conversion of existing buildings and construction of well-designed new buildings on a brownfield site, is to the benefit of the community as a whole. The National Planning Policy Framework fully allows for this in the Green Belt and Areas of Outstanding Natural Beauty. The redevelopment of the Molins site is an opportunity to help maintain the economy of the local community and reduce the level of out-commuting from the area.
- 9.2 The development and diversification of agricultural and other land-based rural businesses is still important to the Parish, but in developing a mixed use development within the Molins site to include a number of B1 units of varying size, and a retirement village, providing suitable accommodation for the aging sections of the parish population to down-size to while maintaining their local social networks will; bring benefits from the use of the land; benefit the local economy and its community in a sustainable way and recognise the rural character, AONB and Green Belt setting. In any event, Paragraph 89, final bullet point, of the National Planning Policy Framework specifically allows such redevelopment in sensitive areas, on previously developed sites.
- 9.3 It is extremely rare that very significantly-sized employment sites in the Green Belt/AONB, such as Molins, become available for redevelopment. The National Planning Policy Framework specifically allows them to be redeveloped for uses which are no more impacting than the use which they replace. It does not specify the uses to which they be put.
- 9.4 From the advice the WG have received it appears that the policies developed within the NP will have limited weight within the forthcoming public enquiry and the PC and WG should feel free to develop policies for the South Saunderton area as they see necessary. The NP cannot propose

divergent policies dependent upon the outcome of the forthcoming appeal hearing and therefore the PC and WG will need to work with its strategic partners, rCOH and WDC, in order to come to an agreement over what quantum of development will be acceptable on the site within the context of sustainability considerations, and extant local and national planning policies. The following recommendations do not therefore make firm proposals with regards quantum, however, regardless of quantum it is considered that, subject to viability tests, all recommendations should be applied.

It is recommended that:

- 9.5 The WG work with its strategic partners to develop detailed policies that will ensure development on the former Molins Factory site (Area 1, Fig 2, this report), guaranteeing a mixed use for the site and giving priority to the following particular land uses:
 - 1) Open market residential housing/starter homes subject to the policies and recommendations outlined in Paragraphs 89 and 90 of the HDTG Report and the relevant WDC Green Belt policies.
 - 2) Office/serviced office space (B1). For the purposes of definition, The Planning Law concept of B1 is defined by; B1(a) Offices (other than Financial Services); B1(b) Research and development of products and processes; B1(c) Light Industry (i.e. which can be carried out in a sensitive area with no adverse environmental effects).
 - 3) Retirement Village.

The above priorities for the land use mix are evidenced and supported by the information provided in Sections 6 to 8 of this document.

9.6 Any development at the former Molins Site (Area 1, Fig 2, this report) should be connected with an upgraded all-weather walking and cycling route to Saunderton Station. Prior to any development being approved the applicant will need to have demonstrated that such a route has been secured with the relevant neighbouring land-owners and provided a long-term maintenance strategy. In order to minimise light pollution within the sensitive location in the AONB the route should be lit only at key points where safety concerns are an overriding consideration, and in these instances according to recommendation 9.9 below.

As outlined in paragraph 4.4 of this report the overwhelming response from residents in the Parish Survey was that development on the former Molins sites should be linked with Saunderton Station.

9.7 Any development in the area outlined in Figure 1 of this report should adhere to policies for the protection of Scheduled Ancient Monuments and follow the guidance of Historic England with regards their long-term management and presentation.

This is supported by the landscape strategy for the Wye River Valley Landscape Character Area published by Bucks CC which promotes the need to conserve archaeological sites/monuments and their setting.

- 9.8 Any new development or redevelopment in the area outlined in Figure 1 should ensure that road layouts on the site avoid "dead" areas and accord to WDC and TfB policies for safe streets.
- 9.9 Whilst having consideration for 9.8 above, lighting for footpaths, communal areas and private external lighting fixtures in the area outlined as South Saunderton in Figure 1 of this report should have regard for the requirement to minimise light pollution within the AONB, and accord with the relevant design guidance for lighting design within E1 areas ("intrinsically dark areas", i.e. AONBs and National Parks) as defined by the Institute of Lighting Professionals *Guidance Notes for the Reduction of Obtrusive Light GN01:2011*.

The protection of our rural dark skies within the AONB was a priority highlighted in the Parish Survey and highlighted in the HDTG Report.

- 9.10 With regards the natural environment and landscape design on the former Molins Site as defined by Area 1 *and* 2 in Figure 2 of this report:
 - Adequate Sustainable Urban Drainage systems should be provided within Area 1 or 2 in order to negate all risk of off-site flooding as a consequence of any development within Area 1.
 - All mature trees and boundary hedges within Area 1 and 2 should be maintained and protected within any development.
 - Any new property boundaries on the site should be defined with native hedging stock in preference to fencing where appropriate. In the instances of pockets of high density residential development vernacular walling materials may be appropriate as an alternative.
 - Area 2 should be returned to farmland and managed as an area of bio-diverse chalk grassland.

Dealing with local flooding issues, the protection of hedgerows and trees, the restoration of key local habitats and the use of vernacular building materials were all highlighted as priorities in the Parish Survey. Furthermore the landscape strategy for the Wye River Valley Landscape Character Area published by Bucks CC highlights the need to support and promote expansion and connection of chalk grassland areas and to improve biodiversity.

- 9.11 With regards the built environment and design on the former Molins Site as defined by Area 1 in Figure 2 of this report:
 - Building heights should be limited to 2-storey in height to minimise impact on the landscape and topography.
 - B1 development on the site should be of rural character.
 - Any larger buildings on the site should consider utilising the existing topography the use of "green roofs" in order to minimise their visual impact from surrounding viewpoints.
 - All development on the site should consider the Chilterns Building Design Guide as mandatory guidance.
 - All new residential development on the site should qualify for a minimum of four stars under the BRE Home Quality Mark¹².
 - For non-residential buildings on the site new development should adhere to the appropriate BRE Standards (currently BREEAM UK New Construction, Non-domestic Buildings (United Kingdom), Technical Manual SD5076: 4.1 2014).
 - Adequate parking provision should be provided according to the type of building so as to avoid reliance on on-street parking.

As outlined in the HDTG report the responses to the Parish Survey indicated a strong desire from residents that all new development should be in harmony with the rural character of the area and promote a high-level of energy conservation in new buildings. The Bucks LCA priorities for the Wye River Valley highlight the need to prevent inappropriate new development which would compromise the intactness of historic villages such as Bradenham and West Wycombe *or further extend settlement into the rural landscape*.

¹² Home Quality Mark Technical Manual SD232: 0.0 (Beta England) – 2015

- 9.12 Any and all development on the Molins site should be connected to Superfast Broadband. It is essential that to have Superfast Broadband available to all units/homes within the site. Its close proximity to the high-speed fibre cable along the A4010 make this economically viable under the policies defined by the Community Infrastructure Task Group (CITG) Report.
- 9.13 Should the work outlined in 10.5 develop policies supporting a quantum of development that generates the requisite developer contributions such a development should make contributions towards:
 - Improvements to the Haw Lane/A4010 Junction in order to reduce speeds on the A4010 at this point and the provision of a central refuge for road users turning right from Haw Lane on the A4010.
 - Changes to the Haw Lane/Chinnor Road junction in order to reduce vehicle speeds and improve the junction for pedestrians.

Traffic speeds on Haw Lane and safety concerns at the A4010/Haw Lane junction were regularly raised by residents in the Parish Survey and in the Consultation responses.

- As recommended by the CITG the Parish Council should undertake a project to assess vehicle speeds on the A4010, in this instance specifically at the Haw Lane/A4010 junction, in order to assess the success of the 50mph limit at this point.
- 9.14 Subject to the work outlined in 9.5 community infrastructure facilities should be included within proposals for development in Area 1, Figure 2 to be appropriate and adequate to the eventual mixed use composition.

10 References & Appendices

- ONS Census Data: Various data sources from the Census, where possible the most up to date (2011) data has been used.
- ONS mid-year Population estimates: These have been used to estimate population changes each year. These have only been published at ward level, rather than parish.
- Internal Monitoring: Monitoring of residential and employment development by WDC and Bucks CC, see the Annual Monitoring Report for more information.
- Wycombe District Landscape Character Assessment: http://www.buckscc.gov.uk/media/1997190/134-LCA-Wye-Chalk-River-Valley.pdf
- www.britainfromabove.org.uk Images EAW036641 and EAW052351
- Buckinghamshire Housing and Economic Development Needs Assessment. January 2016.
- Press release Boosting productivity in rural areas Department for Communities and Local Govt, February 2016
- Wycombe District Council 2015, Viability Assessment: Final Report
- www.gov.uk/government/uploads/system/uploads/attachment_data/file/399186/Business es_January_2015.pdf pp. 1, 6 & 7
- Buckinghamshire Thames Valley Local Economic Partnership, *Plan for Sustainable Economic Growth 2012 2031*. Pg. 13. Point 6.19
- Home Quality Mark Technical Manual SD232: 0.0 (Beta England) 2015
- Employment site viability testing, appendices Feb 2014. Former Molins

Appendix 01: Wycombe District Council 2015, Viability Assessment: Final Report

Land Value Data from pages 16/17

"4.9.3 By way of summary, the thresholds that we will use to assess viability in this report will be:"

Agricultural existing use: £350,000 per hectare £142,000 per acre

Commercial/employment existing use:

Reflecting a level of abnormal costs: £1,700,000 per hectare £688,000 per acre With no abnormal costs: High Wycombe/Stokenchurch/Marlow £1,400,000 per hectare <u>£567,000 per acre</u> Remaining areas £950,000 per hectare <u>£385,000 per acre</u>

Residential existing use:

£2,000,000 per hectare, £810,000 per acre To £4,000,000 per hectare, <u>£1,620,000 per acre</u>

Appendix 02: Housing in Bledlow cum Saunderton.

The most common house type within the parish is detached property with 3 bedrooms, with 43% of total residents owning their property outright.

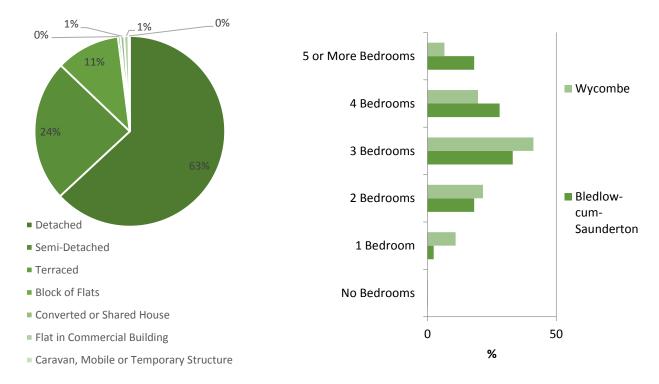
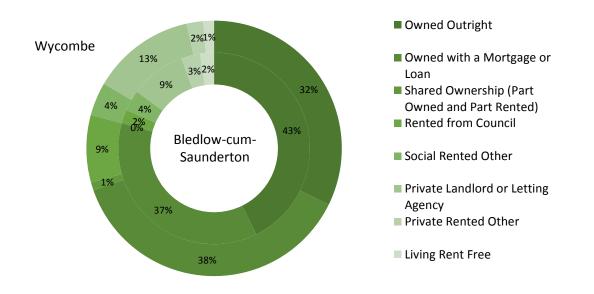


Fig A. Household types in Bledlow-cum-Saunderton (Parish)¹³ and Fig B. Number of bedrooms¹⁴





¹³ 2011 Census – <u>Accommodation Type (Households) (QS402EW)</u>

¹⁴ 2011 Census – <u>Number of Bedrooms (QS411EW)</u>

¹⁵ 2011 Census – Tenure (KS402EW)

Appendix 03: Traffic Impact of Retirement Villages

CCL Ref: 14050-271015-fairmaid

27 October 2015

Shane Fairmaid Momentum Projects Limited

By e-mail only: shanef@momentumprojects.co.nz



Dear Shane

Anderson Monk Retirement Village, Arrowtown: Overview of Traffic Effects

Further to our recent discussions and subsequent e-mails, we have carried out a preliminary and high-level assessment of the likely traffic and transportation effects of the proposed retirement village at McDonnell Road, Arrowtown.

Background

Based on the information received, the development site is located towards the northwest of the McDonnell Road / Hogans Guily Road intersection, approximately 2.1km south of Arrowtown town centre.

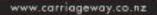


Photograph 1: Aerial Photograph of Site

We understand that up to 120 independent villas are proposed, as well as up to 55 apartments and 100 beds within an aged care facility offering rest home, hospital and dementia care. There will also be ancillary amenities provided, including dining facilities, iounges, a library, swimming pool, gym, bowling green and gardens / landscaped areas.

Access to the site will be via one vehicle crossing onto McDonnell Road, located approximately 1km northwest of the McDonnell Road / Hogans Guily Road Intersection.

traffic engineering hansport planning





McDonnell Road is a Local Road under the Queenstown Lakes District Plan. In the vicinity of the site it is subject to an 80km/h speed limit and provides two traffic lanes (one in each direction) of 3.5m width each. There is a shared walkway/cycleway which runs along the western (site) side of the road, which is metalled.

Further north, McDonnell Road becomes more urbanised and the speed limit reduces to 50km/h. There is residential property along the eastern side of the road together with a parking lane of 2.5m width, and numerous private driveways. There are also four speed humps on this part of the road, each of which has an advisory speed limit of 25km/h.

At its northern end, McDonnell Road meets Arrowtown-Lake Hayes Road, Berkshire Street and Malaghans Road at a priority-controlled, crossroad intersection. Priority is given to the Arrowtown-Lake Hayes Road / Berkshire Street route and therefore traffic on McDonnell Road must give-way.

Council records show that McDonnell Road carries approximately 950 vehicles per day (two-way). Applying standard ratios, this indicates that the road carries around 120 to 140 vehicles (two-way) in the peak hours. The Austroads Guide to Traffic Management Part 3 ('Traffic Studies and Analysis') sets out a way by which the level of service on a road can be calculated, and using this methodology, McDonnell Road presently provides Level of Service A. This is the best level of service, and is described by the guide as "a condition of free flow in which individual drivers are virtually unaffected by the presence of others in the traffic stream...and the general level of comfort and convenience provided is excellent."

Anticipated Traffic Generation

By their nature, retirement villages have a lower traffic generation than other types of residential property, and travel in the peak hours is also lower. This is because the traffic generation of standard residential properties is in large part determined by the need to travel for employment and education (that is, travel to work and the 'school run') and these journeys generally need to be made in the early morning and late afternoon. Residents in retirement villages do not need to undertake employment and education travel, and typically also have greater discretion to make trips for other purposes at different times of the day.

Based on the traffic generation characteristics of other retirement villages that have been accepted elsewhere in the South Island, we anticipate that the independent villas and apartments will each generate 2 vehicle movements per day (allowing for both residents and guests). With up to 120 independent villas and 55 apartments being proposed, this equates to 350 vehicle movements per day (two-way).

We also expect that each care bed will generate 1.5 vehicle movements a day (which allows for visitors, staff and service vehicles) and with up to 100 beds proposed, this will result in 150 vehicle movements per day (two-way).

The ancillary facilities will not generate any traffic movements on McDonnell Road, because they will be available only to residents who are already within the site.

In total then, the site will generate 500 vehicle movements per day. Allowing for 20% of these to be generated in the peak hours, the proposed development would generate 100 vehicle movements (two-way) at the busiest times.



Type of Unit	Maximum Number	Trip Rate Per Day	Trips Per Day	Peak Hour Trips
Villas	120 units	2 (residents and visitors)	120 in + 120 out	48 (two-way)
Apartments	55 units	2 (residents and visitors)	55 in + 55 out	22 (two-way)
Care beds	100 beds	1.5 (residents, visitors and service vehicles)	75 in + 75 out	30 (two-way)
Total	-	-	240 in + 240 out	100 (two-way)

Table 1: Traffic Generation of Proposed Development

Anticipated Traffic Effects

A detailed analysis of the likely traffic effects and access layout at the retirement village is beyond the scope of this report and will need to be carried out as part of the resource consent application. However, we have recalculated the level of service on McDonnell Road using the anticipated daily and peak hour flows, plus the traffic associated with the retirement village. Our analysis shows that Level of Service B would be provided. This is described in the Austroads Guide to Traffic Management Part 3 ('Traffic Studies and Analysis') as "in the zone of stable flow where drivers still have reasonable freedom to select their desired speed and to manoeuvre within the traffic stream. The general level of comfort and convenience is a little less than with Level of Service A*. As such, a very good level of service will still be provided on the road within the development in place.

The peak hour traffic equates to one additional vehicle movement every 36 seconds, and in our view it is unlikely that this will be perceptible. At other times of the day, the traffic generation will be lower than this, and thus any change in the traffic stream will continue to be unnoticeable.

For comparative purposes, we have looked at the current peak hour traffic flows on Berkshire Street as the main entrance into Arrowtown. Surveys carried out in 2014 showed that north of Witshire Street, Berkshire Street carries around 275 vehicles in the peak hours, equivalent to one vehicle movement every 13 seconds. In practice, the traffic generated by the retirement village will be dispersed on the network (that is, some will travel to Queenstown, others to destinations to the east, and some to Arrowtown) but if an absolute worst case is adopted of *all* traffic using Berkshire Street, the rate of flow would change to one vehicle movement every 9.6 seconds. We consider that this difference is unlikely to be noticeable.

Finally, we have reviewed the likely change in performance at the Berkshire Street / Witshire Street roundabout (taking into account the recently-consented refuelling facility). Again allowing for the absolute worst case of all retirement village traffic using Berkshire Street, our analysis shows that the queues at the roundabout in the peak hours would increase by less than one vehicle, and delays would change by under half a second. This difference is unlikely to be noticeable.

With regard to road safety matters, there is no evidence of any existing road safety issues in the immediate area. We therefore do not anticipate that the increased traffic volumes will result in any difficulties arising.

Conclusions

We reiterate that a more detailed analysis will be required to accompany the resource consent application, taking account of the confirmed number of units and beds, and the detailed site layout. On the basis of our analysis to date, we consider that the level of service on the roading network will change slightly as a result of the development but will remain very good. Moreover, even



assuming the worst case of all peak hour retirement village traffic traveling into Arrowtown, the differences in queues and delays at intersections within the town will be negligible.

Please do not hesitate to contact me if you require anything further, or clarification of any matters discussed above.

Kind regards Carriageway Consulting Limited

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Andy Carr Director | Traffic Engineer

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