

# Chiltern and South Bucks Local Plan Initial Consultation (Regulation 18) Incorporating Issues & Options <sup>Ref 1</sup>

Joint Response from: **Little Chalfont Parish Council & Little Chalfont Community Association**

## Executive Summary

Little Chalfont Parish Council and Little Chalfont Community Association has prepared this response to the Chiltern and South Bucks Local Plan Initial Consultation (Regulation 18) incorporating Issues and Options. We recognise the pressure from government to provide housing and the difficult challenge to Chiltern District Council, CDC, to ensure that it has a sound Local Plan prepared in relatively short timescales. Our response is based upon a thorough review of the evidence provided by CDC, the results of a survey questionnaire of the residents of Little Chalfont undertaken in January 2015 and the feedback from three public meetings held in February 2016.

Our key responses are:

1. The definition of the housing and functional economic market areas and the decision to prepare a joint Local Plan with South Bucks District Council has not taken account of the unique characteristics of Chiltern district, namely 72% of Chiltern district is designated as an Area of Outstanding Natural Beauty. Given that CDC and South Bucks District Council have already committed to preparing a Joint Local Plan and that the Objectively Assessed Housing Need calculation has been undertaken without the opportunity for consultation, we request that measures are put in place to ensure the unique characteristics of Chiltern district are protected through the drafting of the new Joint Local Plan.
2. The calculation of the forecast population growth included in the Housing and Economic Needs Assessment is based upon an unrepresentative short baseline of data. We are of the opinion that this results in an over estimate of the Objectively Assessed Housing Need and that this should be recalculated. Chiltern district may not conform to the criteria for undertaking an Objectively Assessed Housing Need. Chiltern district is a desirable place to live given its rich countryside and open spaces. It attracts a market premium which is driven by the demand from people who want to live there.
3. It is our opinion that the Metropolitan Green Belt is an asset to a community far greater than Chiltern district and in the absence of a government strategy it is inappropriate for CDC to undertake a relatively isolated Green Belt Assessment.
4. It is our opinion that the methodology adopted by CDC to assess the 'strength' of existing Green Belt is fundamentally flawed. The Part 1 Green Belt Assessment utilises parcels of land which have durable boundaries as defined in the National Planning Policy Framework. For the Part 2 Green Belt Assessment, CDC have fragmented these parcels of land into smaller parcels of land which do **not** have durable boundaries. These parcels of land are smaller than those adopted for the Part 1 Green Belt Assessment but larger than the sites arising from the Call for Sites. The basis of this action appears to be subjective and illogical. In our opinion this contradicts the National Planning Policy Framework requirement for long term durable boundaries. In our view CDC action to undertake a Green Belt assessment is inconsistent with its statutory obligation to protect and enhance Green Belt and the published Core Strategy, Vision, Objectives and Spatial Strategies. We are of the opinion that the flawed methodology **cannot** be used as a basis for declassifying Green Belt and that housing and economic development should not be permitted on Green Belt.
5. The land availability assessment does not take into consideration the Area of Outstanding Natural Beauty status. We are of the opinion that the Area of Outstanding Natural Beauty should be afforded the protection provided by The National Parks and Access to the Countryside Act 1949 which says 'the Area of Outstanding Natural Beauty's purpose is to conserve and enhance the natural beauty'. In our view those words do not permit large scale housing or industrial development.

6. The development of a Local Plan is intended to permit local residents the opportunity to shape their communities. We have clear evidence from our community that they wish to conserve the current Green Belt and Area of Outstanding Natural Beauty. They recognise the need for housing development but are of the opinion Little Chalfont has already accommodated significantly greater volumes of development in proportion to its size than other Chiltern district settlements. They are strongly of the opinion that any further development must be within the current boundaries of the village. We ask that these views are heard and that Little Chalfont is no longer classified as a main settlement for growth in the Core Strategy.
7. The local community has expressed a strong opinion that the existing infrastructure is inadequate to support the current population levels and any further development would be detrimental to the character of the village. We are of the opinion that this infrastructure deficit would undermine the sustainability of any proposed housing or economic development. In particular, any large scale development in or near to Little Chalfont is likely to significantly increase traffic congestion on the A404 which runs through the centre of the village.
8. We are of the opinion that the Sustainability Appraisal includes a number of significant deficiencies and that the assessments of the sites in or immediately adjacent to Little Chalfont should be corrected to remedy these deficiencies. Until such time these sites should be excluded as Areas for Further Consideration.
9. The Sustainability Appraisal utilises a process of pre mitigation, application of mitigation measures and post mitigation assessments to substantiate the sustainability of the proposed housing and economic developments. In our opinion this methodology and the implementation of the methodology, is flawed and as a result the Sustainability Appraisal is not fit for purpose.

Our comments on each of the proposed sites are included as Annexes to Question 6. Each annex considers one of the sites in and near to Little Chalfont proposed by CDC and South Bucks District Council for further testing. We have reviewed and commented on the specific evidence pertaining to each site. We have considered the following factors:

- Review of the definition of the area and how this appears to have been selected;
- Housing and Economic Land Availability Assessment, Green Belt Assessment and National Planning Policy Framework aspects;
- Environmental considerations;
- Ancient woodland impacts;
- Transport and infrastructure;
- Recreation and amenity;
- Site specific data from the Sustainability Appraisal; and
- Reference to the Sustainability Appraisal Scoping Document.

**It is our opinion that the Chiltern and South Bucks Local Plan Initial Consultation (Regulation 18) Incorporating Issues and Options document and the supporting evidence is NOT joined up and does NOT provide any evidence-based justification for the 'Areas for Further Consideration at Stage 2 for Chiltern and South Bucks'.**

**It is our opinion that the inability to meet the Objectively Assessed Housing Need does not constitute 'exceptional circumstances' for the release of Green Belt. Therefore, we reject any proposal to undertake any significant housing or economic development in or immediately adjacent to Little Chalfont. We urge Chiltern District Council to fulfil its obligations to protect and enhance the Green Belt and Area of Outstanding Natural Beauty.**

The detailed responses to each consultation question expand on the above. We have evidenced our opinions where possible and provided a response to all the supplementary topics.

We ask that our response to this consultation is respected and taken into consideration during the drafting of the Joint Local Plan.

**Question 1** Do you have any **comments on the definition of housing and functional economic market areas used, on the draft Buckinghamshire HEDNA or on the needs assessment work planned during the next stages of the Joint Local Plan process?**

Ref	Key Factor	Points to consider
1.1.	Housing Market Area, HMA & Functional Economic Market Areas, FEMA	<p>The housing and functional economic market areas of Chiltern District Council, CDC and South Bucks District Council, SBDC are with one exception relatively similar. CDC is unique by the fact that 72% of the area is designated an Area of Outstanding Natural Beauty. This aspect must significantly affect the dynamics of the housing and functional economic market areas.</p> <p>CDC is regarded by many as an attractive place to live. This is recognised in the Chiltern District Core Strategy <sup>Ref 2</sup> which makes reference to the District as <i>'being very pleasant, medium-sized market towns and small villages set in a high quality countryside setting, the majority of it is part of the Chilterns Area of Outstanding Natural Beauty.'</i></p> <p>This aspect must also influence the economic market area as it will encourage an increase in leisure based activities and associated businesses.</p> <p>CDC and SBDC both include significant areas of Green Belt Land. The 'Green Belt is an important protection against urban sprawl, providing a 'green lung' around towns and cities' <sup>Ref 3</sup> Understanding and protecting this Green Belt must be key to the definition of the HMA, the FEMA and the 'value' of the Green Belt to all adjoining authorities including Greater London.</p> <p>The basis of the decision to prepare a Joint Local Plan is not immediately apparent but it is understood to be driven by the need to make cost savings in the preparation of the Local Plan.</p> <p>Given the extent of Green Belt, the commuter relationship with London and the M25, it is not immediately apparent why parts of Hertfordshire e.g. Dacorum and Three Rivers District Councils do not also have similar characteristics to CDC and SBDC.</p> <p>For similar reasons it does not appear appropriate for all six Berkshire authorities to be considered as one single market area. As a minimum these should be split into East and West Berkshire.</p> <p>As noted above, CDC is unique in that 72% of the area is designated as ANOB. On this basis there is a strong argument that CDC should remain an entirely separate HMA and FEMA. We believe this argument could be extended to show that the Objectively Assessed Housing Need, OAHN, basis of calculation does not apply to CDC.</p> <p>Given that CDC and SBDC have already committed to preparing a Joint Local Plan and that the OAHN calculation has been undertaken without the opportunity for consultation, we request that measures are put in place to ensure the unique characteristics of CDC are protected through the drafting of the new Joint Local Plan.</p>
1.2.	Buckinghamshire Housing and Economic Needs Assessment, HEDNA <sup>Ref 4</sup>	<p><a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7767&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7767&amp;p=0</a></p> <p>The HEDNA document defines the Housing and Economic Needs for the whole of Buckinghamshire. The document does not consider a needs assessment at any granularity below District Council level.</p> <p>The document does not define the needs assessment work planned during the next stages of the Joint Local Plan process.</p> <p>It is noted that the population statistics for Chiltern District Council are relatively static for the period 1981 to 2001 after which there is an increase in the period 2001 to 2011. The forecast population growth is however based upon a projection of the period 2001</p>

		<p>to 2011. The use of this short baseline may well overestimate the population growth forecast for Chiltern District. This population forecast should then be subject to a sensitivity assessment.</p> <p>As noted above, the OAHN has been completed without the opportunity for consultation it is therefore important that CDC and SBDC take this into consideration when drafting the Joint Local Plan and entering into the Duty to Cooperate process with adjacent authorities. If the population growth is less than forecast, the rate of development can be reduced and the extent of land allocated for housing can be reduced.</p>																																				
1.3.	Housing Development in Little Chalfont	<p>It is our opinion that Little Chalfont has already received new housing at levels disproportionate to that in the surrounding, much larger, settlements. The following data has been prepared from data provided by CDC.</p> <p>In the planning period April 2006 – Mar 2014 the following completion of new homes, and zoning for housing of large sites as yet unbuilt took place.</p> <table border="1" data-bbox="424 725 1498 1061"> <thead> <tr> <th></th> <th>Amersham</th> <th>Chesham</th> <th>Chalfont St Peter</th> <th>Little Chalfont</th> <th>Newland Park <small>(application for 309 homes awaiting decision)</small></th> </tr> </thead> <tbody> <tr> <td>Completions Apr 2006 – Mar 2014</td> <td>290</td> <td>319</td> <td>56</td> <td>262</td> <td>0</td> </tr> <tr> <td>Strategic and MDS Sites</td> <td>32</td> <td>45</td> <td>334</td> <td>45</td> <td>309</td> </tr> <tr> <td><b>Total</b></td> <td><b>322</b></td> <td><b>364</b></td> <td><b>390</b></td> <td><b>307</b></td> <td><b>309</b></td> </tr> <tr> <td>Mar 2011 census: Number of Properties</td> <td>6,086</td> <td>9,049</td> <td>5,073</td> <td>2,479</td> <td></td> </tr> <tr> <td><b>Dwellings percentage growth</b></td> <td><b>5.3%</b></td> <td><b>4.0%</b></td> <td><b>7.7%</b></td> <td><b>12.4%</b></td> <td></td> </tr> </tbody> </table> <p>The CDC Core Strategy includes Little Chalfont among the settlements where development could be focussed. <b>We seek removal of Little Chalfont as a main settlement for growth from the Core Strategy</b> <sup>Ref 2</sup>.</p>		Amersham	Chesham	Chalfont St Peter	Little Chalfont	Newland Park <small>(application for 309 homes awaiting decision)</small>	Completions Apr 2006 – Mar 2014	290	319	56	262	0	Strategic and MDS Sites	32	45	334	45	309	<b>Total</b>	<b>322</b>	<b>364</b>	<b>390</b>	<b>307</b>	<b>309</b>	Mar 2011 census: Number of Properties	6,086	9,049	5,073	2,479		<b>Dwellings percentage growth</b>	<b>5.3%</b>	<b>4.0%</b>	<b>7.7%</b>	<b>12.4%</b>	
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1.4.	Views of Local People	<p>The Chiltern District Core Strategy <sup>Ref 2</sup> section 5.4 sets out the vision that local people are given the opportunity to shape the area in which they live. The Core Strategy makes reference to the District as <i>‘being very pleasant, medium-sized market towns and small villages set in a high quality countryside setting, the majority of it is part of the Chilterns Area of Outstanding Natural Beauty. There is no desire for wholesale change – rather one of conserving the character which exists.’</i></p> <p>Little Chalfont Parish Council and Little Chalfont Community Association issued a questionnaire to local residents during January 2015. This questionnaire included the following:</p> <ul style="list-style-type: none"> <li>• If you were planning the future development of Little Chalfont, how would you want it to look in 2036?</li> <li>• Given the growing population in the country and government pressure for more housing, do you believe that Little Chalfont should play a role in meeting some of the housing needs?</li> <li>• If we are to play a role, where would you see development taking place?</li> <li>• Do you know of any small sites that could be considered and, if so, where?</li> <li>• What are the key infrastructure issues that need to be address in either the short or long term? (e.g. roads, transport, parking, services, schools, shops, businesses, recreation, medical).</li> </ul> <p>This questionnaire elicited a <b>XX%</b> response rate which for this type of survey is considered to be a relatively high response rate. The responses were also very consistent. Evidence of this can be provided upon request.</p> <p>The overwhelming response was that the character of Little Chalfont should be retained</p>																																				

		<p>and the Green Belt and AONB should be retained and protected.</p> <p>The respondents supported the need for Little Chalfont to accept new development in the form of infill development within the current boundaries of the village.</p> <p>The respondents expressed significant concerns about the current infrastructure deficit with respect to roads, transport, parking, schools and medical facilities.</p> <p><b>We disagree with the CDC Core Strategy to include Little Chalfont as a main settlement for growth as we believe it is not supported by the views of local people and we believe would result in wholesale change.</b></p> <p>The LCCA and Parish Council have held three public meetings in Feb 2016 as part of this consultation exercise. The feedback from these meetings and the copies of the responses to CDC that the LCCA and Parish Council have seen to date reinforce the 2015 consultation and support this response.</p>
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**Question 2**     *Do you have any **comments on the draft HELAA**, particularly in relation to whether included sites are likely to be deliverable by 2036 and whether additional sites should be added?*

Ref	Key Factor	Points to consider
2.1.	Housing and Economic Land Availability Assessment, HELAA <sup>Ref 5</sup>	<p><a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7750&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7750&amp;p=0</a></p> <p>In our opinion the use of the HELAA for determining sites for development is flawed. It is not based upon clear strategic planning but a market led list of proposed sites. The list of sites are compiled on the basis of those sites which are easiest to develop and those from which developers can maximise their investment return. This statement is evidenced by the fact that 52.15% arise from the 'Call for Sites'. This is entirely opportunistic.</p> <p>The HELAA does not make reference to factors such as AONB status, biodiversity, etc. These factors are fundamental to the assessment of the sustainability of development which is in turn key to determine if land is available for development.</p> <p><b>The basis of rejecting the four sites (CD0066, CD0082, CD0135 and CD0171) at Stage 1 Assessment is fully supported.</b> We are of the opinion that this decision is in line with the Core Strategy and the views of the local community. We would suggest that instead of testing these sites further at Stage 2, Chiltern District Council should be proposing management measures to enhance the Green Belt and where appropriate AONB status. A history of poor land management should not permit the site to be considered for development. If this is permitted, then in the longer term some unscrupulous landowners will be encouraged to slowly erode the Green Belt and AONB status so that development will eventually be allowed.</p> <p>We recognise the need for limited development in Little Chalfont and we have previously accepted for further consideration all but one of the sites in Little Chalfont now listed as "accepted at Stage 1 for further Assessment at Stage 2". The exception is site CD0225, the publically owned land of Little Chalfont Tennis Club, the inclusion of which is surprising given the Council's policy on encouraging outdoor activities.</p> <p><b>We support the classification of the 9 sites listed in or immediately adjacent to Little Chalfont deemed "not suitable or available at Stage 2 Assessment "</b>, but we note that any development of another site at Pollards Wood, ref CD0149, may be restricted by the ancient woodland at this site.</p> <p>Finally we note that although the three sites CD0082, CD0135 and CD0171 are listed in Appendix 1 as "excluded at Stage 1", these are three of the sites as options for further testing after Stage 1 of the Green Belt review.</p>
2.2.	Central	<p><a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=6819&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=6819&amp;p=0</a></p>

	Buckinghamshire Housing and Economic Land Availability Assessment Methodology <sup>Ref 6</sup>	<p>In our opinion the land availability within Little Chalfont should be restricted to the 19 sites accepted at Stage 1.</p> <p>Para 1.1 of the HELAA Methodology refers to the National Policy Planning Framework, para 47 which recommends that the buffer of land supply should be at 5% or in areas of persistent under delivery of housing should be increased to 20%. Given that the majority of these sites are relatively small and that there are potential flaws in the selection of the HEMA and FEMA and the calculation of the population growth forecast, we consider that in the Local Plan the buffer should be restricted to 5%.</p>
2.3.	Purpose of Green Belt and Circumstances which permit development on Green Belt	<p>The availability of land for development must be influenced by its current designation and quality. As noted 88% of Chiltern District Council is designated as Green Belt.</p> <p>Green Belt was originally established to prevent to outward sprawl of London. <i>The Green Belt in Buckinghamshire was designated in 1954 through the Buckinghamshire County Development Plan. Following this, Circular 42/55, released by government in 1955, encouraged local authorities to establish their own Green Belts</i> <sup>Ref 7</sup>. This use of Green Belt not only prevented the outward sprawl of London but also protected the gaps between settlements thereby reinforcing the prevention of urbanisation of the countryside. It was intended to be a policy of constraint in specific areas whilst encouraging growth in other areas. It is often quoted as being one of the UK's most successful planning tools.</p> <p>It is widely recognised by the professional planning community <sup>Ref 8</sup> that the UK now lacks a strategic approach to Green Belt. The Metropolitan Green Belt is a valuable asset for all communities. The value of Green Belt is forecast to increase as climate change impacts our environment. The Metropolitan Green Belt in the Home Counties and within London should not be reviewed as discrete areas. Neither the government nor the NPPF requires local authorities to undertake an assessment of Green Belt. An assessment is not required to undertake an Objectively Assessed Housing Need and housing need does not classify as exceptional circumstances for development in Green Belt.</p> <p>The House of Commons Library Briefing Paper on Green Belt <sup>Ref 9</sup> includes the following key statements:</p> <ul style="list-style-type: none"> <li>• <i>The NPPF states that that the construction of new buildings should be regarded as “inappropriate” for the Green Belt, although there are some exceptions, which are listed.</i></li> <li>• <i>Online Planning Practice Guidance issued by Government in March 2014 aimed to make clear that “unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”.</i></li> <li>• <i>The policy on protection for the green belt is contained in section 9 of the NPPF, which sets out the fundamental aim of green belt policy:</i>  <i>The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</i></li> <li>• <i>The NPPF sets out the Government’s planning policies for England and how it expects these to be applied. It contains a presumption in favour of sustainable development, which it defines as having three dimensions: economic, social and environmental.</i></li> <li>• <i>Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances”</i></li> </ul>

		<p><i>justifying inappropriate development on a site within the Green Belt</i></p> <ul style="list-style-type: none"> <li>• <b>Do housing and economic needs override constraints on the use of land, such as Green Belt?</b></li> </ul> <p><i>The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.</i></p> <p><i>The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest; land designated as green belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.</i></p> <ul style="list-style-type: none"> <li>• <b>Do local planning authorities have to meet in full housing needs identified in needs assessments?</b></li> </ul> <p><i>Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.</i></p> <p><i>However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.</i></p> <ul style="list-style-type: none"> <li>• <i>Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement. They also need to consider whether there are opportunities to co-operate with neighbouring planning authorities to meet needs across housing market areas.</i></li> </ul> <p>We believe that any development of the sites proposed for testing in or adjacent to Little Chalfont which are currently designated as Green Belt would be against the published guidance. Any large scale development:</p> <ul style="list-style-type: none"> <li>• Would constitute urban sprawl and would destroy the openness of the landscape;</li> <li>• Cannot be justified on social, economic or environmental grounds;</li> <li>• Can be proven to be unsustainable;</li> <li>• Does not take account of AONB status.</li> </ul> <p><b>We therefore conclude that any further assessment of the sites proposed for testing is unnecessary as the sites will be ‘undeliverable’. In this instance that the unmet housing does not constitute a special circumstance which would permit development in Green Belt and would be against the presumption of sustainable development.</b></p>
2.4.	Buckinghamshire Green Belt Assessment Part 1A: Methodology <sup>Ref 7</sup>	<p><a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7461&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7461&amp;p=0</a></p> <p>The Buckinghamshire Green Belt Assessment Part 1A: Methodology <sup>Ref 7</sup> recognises that the Planning Policy Framework does not provide guidance on conducting a Green Belt assessment. It proposes that both the Part 1 and 2 Assessments are undertaken to identify land that has performed least well as Green Belt.</p> <p>The document also reiterates the duties set out in NPPF para 81 for local authorities to plan positively to enhance the beneficial use of Green Belt including:</p> <ul style="list-style-type: none"> <li>• The retention and enhancement of landscapes, visual amenity; and</li> </ul>

- The improvement of derelict land.

The original Green Belt land was designated as such because it met one or more of the five purposes of Green Belt. It is assumed that the original designation is to be reassessed now to either remove the land from Green Belt or as the basis on which to enter into Duty to Cooperate discussions with neighbouring authorities with a view to the neighbouring authority meeting the unmet housing demand.

If the land has performed less well as Green Belt, this is a reflection of the failing of the local authority to fulfil its duties to protect and enhance Green Belt. It should not be seen as an opportunity change the original designation. This is partly why there are no nationally accepted guidelines for undertaking a Green Belt assessment.

The reference to the High Court judgement against Solihull Metropolitan District Council appears to be used to set a precedent for the need for an assessment. However without a thorough investigation into this particular case it could be that this is an incorrect conclusion. SMDC had failed on the more significant matter that it had not assessed the housing need as a separate and prior exercise. As noted above, it would seem that CDC has taken a decision to undertake a Green Belt assessment. Not only is this not required it could be argued that it contradicts all published Core Strategy, Vision, Objectives and Spatial Strategies.

The CDC consultant's workshops with neighbouring authorities to share experiences of undertaking Green Belt assessments appears to have missed the opportunity for the local authority to be directed to fulfil its obligation to protect and enhance the Green Belt which may have performed less well.

The NPPF guidance for the establishment of Green Belt requires Green Belt to be defined by durable boundaries using physical features that are readily recognisable and likely to be permanent.

The NPPF guidance for the establishment of Green Belt requires local planning authorities to satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period, and to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The Buckinghamshire Green Belt Assessment Part 1A: Methodology<sup>Ref 7</sup> extends this definition: *Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus, permanent man-made and natural features were selected as the basis of criteria for the identification of the General Areas. In particular, the boundaries of the General Areas were based on the following features: Motorways; A and B Roads; Railway lines; River Chess; River Colne; River Misbourne; River Thames; and River Wye.* The Part 1 Assessment appears to have selected parcels of land on this basis.

**The scoring in the Part 1 Assessment has generally demonstrated that the land around Little Chalfont has met one or more of the original Green Belt criteria.**

CDC's consultants undertaking the assessment appear to have been requested to subdivide the original parcels for Green Belt assessment into smaller parcels. These smaller parcels remain larger than the parcels of land identified as possible areas for housing or economic development in the Regulation 18 Consultation Document. The reasons for this have not been made publically available. Professional judgement is cited in para 4.2.6 but without reference to the basis of such judgement. The logic behind the subdivision is not immediately apparent. We are concerned that the smaller parcels of land could be considered inappropriately to be more vulnerable. More importantly the smaller parcels of land being considered for the Part 2 Assessment are no longer defined by hard boundaries such as Class A roads, railway lines or rivers. In most cases the boundaries are small country lanes. This is in contravention of the NPPF guidance and the stated methodology. It would appear that CDC has instructed their consultants to



		<p>amend the size of the parcels of land with a view to building a case to allow parcels of land which would be attractive to developers to be removed from Green Belt.</p> <p><b>We are of the opinion that CDC has not complied with their published methodology for assessing how parcels of land have performed against the original Green Belt criteria. We believe it also contravenes NPPF and is a wilful disregard of CDC’s obligation to protect and enhance Green Belt.</b></p> <p>Furthermore, the methodology does not define the decision making process between the steps of demonstrating that a small parcel of land may not meet the original Green Belt criteria and identifying it as being suitable for either housing or economic use.</p> <p><b>This lack of disclosure or clarity means that the proposals set out in Map 6.1a for ‘Areas for Further Consideration at Stage 2 for Chiltern and South Bucks, South’ are not evidence based and therefore unacceptable for the purpose.</b></p> <p>It is our understanding that it is not a statutory requirement for CDC to undertake an assessment of the Green Belt but that CDC has chosen to do so. In support of our understanding, according to Government Guidance, once objectively assessed needs are assessed, the local planning authority should look to meet the needs ‘unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF’s policies taken as a whole, including constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.’ The guidance states that ‘unmet housing need in a particular area is unlikely to meet the very special circumstances’ test to justify Green Belt development. Furthermore, rather than just a detailed search for sites for release from the Green Belt, as part of the review CDC should have paid similar attention to its obligation to protect and enhance the Green Belt. Any parcels of land identified as having a weak Green Belt score could and should be targeted by CDC with new measures to protect, enhance or reinstate the land to its original Green Belt value, rather than CDC simply viewing them as a target for development.</p> <p>It is our view that it was appropriate for Chiltern District Council to undertake the Part 1 Green Belt Assessment. As directed by current legislation, CDC should be reminded of its obligation to protect and enhance the Green Belt.</p> <p><b>It is our opinion that NONE of the parcels of land around Little Chalfont should be classified as having performed less well as Green Belt and NONE should not be released for housing or economic development.</b></p> <p>Little Chalfont is a village close to Amersham and surrounded by a number of smaller settlements. The Green Belt assessment methodology does not define Little Chalfont as a ‘Top Tier Site’ which we believe is correct. The CDC Core Strategy includes the intention to protect and enhance Green Belt but it also includes Little Chalfont among the settlements where development could be focussed. <b>We seek removal of Little Chalfont as a main settlement for growth from the Core Strategy.</b></p> <p><b>We are of the opinion that Little Chalfont has defined boundaries and that these should be protected. Little Chalfont should not be allowed to coalesce with either Amersham or erode the open countryside between nearby settlements.</b></p> <p><b>We do not support CDC’s decision to undertake a Part 2 Green Belt Assessment. We can only assume that it is driven by a desire to provide land to meet the OAHN and a fear that there is a presumption that development should be permitted if it can be demonstrated to be sustainable.</b></p>
2.5.	AONB	<p>The availability of land for development must be influenced by its current designation and quality. As noted 72% of Chiltern District Council is designated as AONB</p> <p>The National Planning Policy Framework (NPPF) guidance on planning practice is strongly</p>

		<p>in favour of the protection of both the AONB and the Green Belt. The objectives of conserving and enhancing both the AONB and the Green Belt are supported by the following:</p> <ul style="list-style-type: none"> <li>• AONBs and National Parks have the same levels of landscape and protection.</li> <li>• The Chilterns Area of Outstanding Natural Beauty Management Plan 2014-2019 <sup>Ref 10</sup> acknowledges that the Chilterns is possibly the most heavily visited landscape in the UK, with over 55 million leisure visits a year.</li> <li>• Development growth from other urban areas will result in greater numbers of people using our AONB and Green Belt for recreation, supporting the economy of the District.</li> <li>• The National Parks and Access to the Countryside Act of 1949 defined the purpose of the AONB as ‘to conserve and enhance the natural beauty’, which in our view is not consistent with large scale building. The Countryside and Rights of Way Act of 2000 placed a duty on public bodies to ‘have regard to the purpose of the AONB’.</li> </ul> <p>The Chilterns Conservation Board was established by Parliamentary Order in 2004 and has two statutory purposes:</p> <ul style="list-style-type: none"> <li>• To conserve and enhance the natural beauty of the AONB; and</li> <li>• To increase the understanding and enjoyment of the special qualities of the AONB.</li> </ul> <p>In response to our own consultation local residents have shown strong opposition to any new development in the Green belt or in the AONB. The fundamental aim of Green Belt policy is to prevent urban sprawl and there is a legal requirement that Green Belt boundaries should be changed only in exceptional circumstances, in order to protect the ‘green lungs around towns and cities’.</p> <p>It is sometimes argued by developers that areas of Green Belt and AONB adjacent to existing settlements are somehow less open or beautiful than those further out in the countryside. This is emphatically not so at Little Chalfont. The green spaces on the eastern borders of our village are pristine, and from within them one looks out mainly on to open, beautiful country. This enhances the enjoyment of the AONB.</p> <p>To the north of the village, between Bell lane and Stony lane, lies the Chess valley, one of the most attractive and tranquil rural recreation areas in the county. Many fine walking paths into that valley begin in, or pass through, the Green Belt/AONB areas adjacent to the village; they are its natural threshold and should not be urbanised.</p> <p><b>It is our opinion that the Local Plan should continue to protect and keep precious the existing AONB sites and boundaries. In particular we urge that care be exercised when any development of such areas would have an adverse effect on any adjoining AONB.</b></p> <p>It is worth noting that even those in the planning community, such as The Adam Smith Institute, that recommend a complete re-evaluation of Green Belt because high intensity farming has devalued the quality of the land, argue that areas such as Sites of Special Scientific Interest, RAMSAR and AONB should be retained. None of the parcels of land identified for testing could be described as being subject to high intensity farming practices.</p>
2.6.	Sustainability	<p>For land to be considered as available for development, it must first be determined that the proposed development will be sustainable.</p> <p>As detailed in Question 17, sections 17.4 to 17.13 below we are of the opinion that the Sustainability Appraisal does not demonstrate that the proposed developments would be sustainable.</p> <p>We are of opinion that specific data needs to be available for the assessment to be</p>

commensurate with any assessment of proposed development sites. We believe this to be inappropriate as regional and district level data is not of a high enough spatial resolution and quality to accurately base long term planning decision on and contradicts the notion of sustainability and the NPPF in the requirement that future development needs to be appropriate to the context of local areas. We feel that the spatial resolution of maps and data is not of a high enough quality for a true and accurate assessment of individual locations. We recommend that the assessment should utilise the parcels of land considered as part of the Part 1 Green Belt Assessment.

In our opinion AONB is not given adequate consideration and we are of the opinion that AONB sites should be excluded from the sites for testing.

A cornerstone of any development must include Accessibility and Transport. This section requires local transport authorities to develop robust evidence base when transport planning. It is clear that a key assumption in an assessment of the sustainability of Little Chalfont is the access to rail services into London and access to the M25. TfL has recently introduced new rolling stock on to the Metropolitan Line and a small increase in train frequency is planned to be in place by 2022. However the service is already standing room only at peak times and this is unlikely to change. The A404 through Little Chalfont is regularly subject to very significant congestion, not only in peak hours. There do not appear to be any publically available plans to mitigate even the current infrastructure deficit nor to consider any feasibility options to take account of the impact of the proposed development. **We are of the opinion that these two factors do not support the sustainability of further development in Little Chalfont.**

We fully support the Environment Agency's consultation response.

The Sustainability Appraisal aims to provide a high level assessment of reasonable alternatives being considered as part of the planned consultation on the Local Plan. Although it is long and detailed, **the report is inconclusive and there are significant deficiencies in the methodology.**

We do not support the notion suggested by this assessment that the loss of cultural heritage and landscape is equal to transport and housing gains. In addition there are negative impacts to health, climate change adaptation and biodiversity. We are of the opinion that the combination of negative factors outweighs the benefits.

Section 11.2.3 excludes areas that are designated AONB but then goes on to assess sites in Little Chalfont that are AONB.

The appraisal attempts to determine the strength of *character* and *intactness*. There is no explanation as to how this has been scored. We are of the opinion that *character* and *intactness* are related to public amenity value and are probably best assessed by the public. Our questionnaire in Jan 2015 elicited a clear response from our community that they value the amenity of the open spaces around Little Chalfont.

It is claimed that the appraisal process uses the SA Framework to assess each site. In practice, the analysis fails to address the questions set out in Appendix A. For example, for the **SEA Objective "Landscape"** the questions specified, but not addressed, for the decision-making criterion are: "Will it safeguard and enhance the character of the landscape and local distinctiveness and identity? Q2b Will it protect and enhance visual amenity, including light and noise pollution? Q2c Will it reuse degraded landscape/townscape? Q2d Will it compromise the purpose of the Green Belt e.g. will it lead to coalescence of settlements and/or urban sprawl? Q2e Will it protect and enhance the characteristics and setting of the Chilterns AONB and/or Colne Valley Regional Park?"

The SA confirms that a high proportion of residents (39.3%) in Chiltern travel to work by car or van and that there is a heavy dependency on personal car use. The rates of commuting by bus is lower than the County, Regional and National averages. The SA

		<p>suggests that this might be due to bus services being sporadic.</p> <p>Similarly, the Indicators for the <b>SEA Objective "Transport"</b> include frequency of bus services and distances to amenities, bus routes etc. In the analysis bus frequency is not analysed and paragraph 2.6.5 states "Distances have been measured from the centre of the site to the centre of the receptor. This has been measured as the crow flies, as it is not possible to know the routes of roads and footpaths through the development sites at this stage." This approach reveals three serious flaws : (a) for large sites, measurement from the centre of the site will clearly not reflect the distance from the edge of the site furthest from the receptor; (b) to comply with Barton (Barton et al, 2010), as claimed, the distances should be assessed/measured as the distance for travelling, and crow flying distances must provide seriously underestimated values for actual travelling distances; (c) the absence of knowledge of the roads and footpaths is indicative of a more general failure to address the ease of access to the sites. While (a) and (b) could have been (but were not) addressed by adjustment to the Barton recommendations, the ease of access to the site would have been an important factor in addressing the two questions specified for the decision-making criterion for the SEA Objective "Transport" viz Will it reduce the need to travel? Will it provide adequate means of access by a range of sustainable transport modes (i.e. walking/cycling/public transport)?</p> <p><b>We are of the opinion that these are significant deficiencies.</b></p> <p>The SA collates the pre-mitigation assessment matrix in Table 5.1. Section 5 sets out mitigation measures that can be taken and then the SA concludes with the Post-mitigation assessment matrix in Table 5.2.</p> <p>In our opinion the mitigation measures considered are wholly inadequate. They are often generic and in a number of cases could not be implemented. There is no evidence of any attempt to weight or scale the effect of the proposed mitigation and yet between Tables 5.1 and 5.2, 99% of the assessment scores move from 'Adverse' to 'Positive'. <b>In our opinion this methodology and the implementation of the methodology, is flawed and as a result the Sustainability Appraisal is not fit for purpose. We believe that sites proposed for further testing are undeliverable as they cannot be demonstrated as being sustainable.</b></p>
2.7.	Views of Natural England and Sport England	<p>We support the view of Natural England, in their comments on the HELAA Methodology, that high quality agricultural land should be included in the criteria for sites to be excluded from identification through the HELAA, and the view of Sport England that playing fields should likewise be excluded for the reason in paragraph 74 of the NPPF.</p>
2.8.	Proposed Sites	<p>The purpose of the Part 1 Green Belt Assessment should have been to assess the designated General Areas/ parcels against the NPPF defined purposes of the Green Belt. However, as indicated in para 2.3 above, various parcels of land have been selected for a Part 2 review, without proper disclosure of any evidence to support the selection.</p> <p>Our comments on each of the proposed sites in or immediately adjacent to Little Chalfont are included as Annexes to question 6.</p>
2.9.	Infrastructure	<p>Please refer to our response in section 16.9 below.</p> <p>We are of the opinion that the Chiltern and South Bucks Settlement and Infrastructure Capacity Study <sup>Ref 11</sup> document demonstrates that the existing infrastructure issues are not fully understood. <b>In the absence of a proper assessment, we are of the opinion that from an infrastructure perspective, the proposals being assessed by CDC should be categorised as undeliverable, at least until a comprehensive assessment has been completed.</b></p>

**Question 3** Are there **existing uses not currently identified in the HELAA** and within the built up areas that

*may be surplus to requirements or where the existing use could be consolidated or re-provided elsewhere such as open spaces, sports and leisure uses?*

Ref	Key Factor	Points to consider
3.1.		We do not believe there are any existing uses identified in the HELAA that are surplus to requirements.

**Question 4** *Do you agree with the **approach to the Joint Local Plan Vision and Objectives** and if not what changes or additions do you consider are needed? Please explain your reasoning for suggesting any alterations.*

Ref	Key Factor	Points to consider
4.1.	Previous Consultation Findings	<p>The Consultation Document <sup>Ref 1</sup> para 4.3 refers to the broad findings from earlier consultations and includes the statement: <i>Green Belt protection will need to be considered in the context of development needs and the Green Belt Assessment.</i></p> <p>The results of the questionnaire undertaken in Little Chalfont in January 2015 do <b>not</b> support this view. See 1.4 above.</p> <p>We are of the opinion that development needs and Green Belt are entirely separate matters. The basis of this view is that Planning Practice Guidance on Green Belt confirms that unmet housing need (including for travellers sites) is unlikely to outweigh the harm to Green Belt or constitute very special circumstances that justify development in Green Belt.</p>
4.2.	Core Strategy General	<p>The consultation document states that the Joint Local Plan will review the Vision, Plan Objectives and Spatial Strategy set out in both councils core strategies and produce a revised vision, objectives and strategy for the joint plan area to 2036.</p> <p>Our comments on the CDC Core Strategy are included below.</p> <p>The Chiltern District Council's Core Strategy document states: <b>'One of the key elements of the planning system is the opportunity it provides for communities to shape the places in which they live.'</b> The key messages from our community, where we consulted widely, were:</p> <p>A virtually united view that <b>none</b> of the areas of Green Belt and AONB that surround Little Chalfont should be released for development.</p> <p>The Green Belt and AONB was frequently quoted as a principal reason for choosing to live in Little Chalfont.</p> <p>Most of the existing vision in Section 5.4 of the Core Strategy remains valid, but it does not put enough stress on protection of the Green Belt and AONB, or on the wishes of the population. Weakening of policies on the Green Belt and AONB would diminish the character and value of Chiltern towns and villages as places to live, and reduce the District's attractiveness to its millions of visitors – who bring economic benefits.</p> <p>Therefore: The Chiltern District Vision, set out in Section 5.4 of the Core Strategy, should be amended to begin with an additional item: <b>'A place that celebrates, protects and enhances its wealth of Green Belt land and Areas of Outstanding Natural Beauty'</b>.</p>
4.3.	Core Strategy Objective 5	<p>Other than the three major shopping centres, we oppose the government's proposals to relax Use Classes. We have opposed this in a recent Government consultation as we think Local Authorities should have the right to maintain control over retaining/achieving a balance of retail outlets that properly serve the particular needs of local communities.</p> <p>We are aware that high streets and shopping parades are changing in character but have no wish to see them dominated by, for instance, cafes/restaurants or charity shops, to</p>

		the detriment of a good range of other outlets. This may need some amendment to the Vision.
4.4.	Core Strategy Objective 6	The Strategic Objectives in Section 6 should begin with the present Objective 6.
4.5.	New Core Strategy Objective	Add an objective as follows <b>‘To retain the character of settlements unless major change is supported by the local community’</b> .

**Question 5** *What spatial strategy option or options do you think the council should consider and what should be the priority order? Are there any other spatial strategy options that the Joint Plan should consider and why?*

Ref	Key Factor	Points to consider
5.1.	General	We take the opportunity to comment (or not) on all the policies in the Core Strategy.
5.2.		<p>See our comments on the Green Belt Assessment Methodology under Question 2, section 2.4 above.</p> <p>See our comments on the importance of AONB under Question 2, section 2.5 above.</p> <p>It is disappointing that the District Council did not respond to our argument in the previous consultation that Little Chalfont should be removed from the main settlements for growth. With regard to the proposed new ‘hierarchy of settlements’ we maintain this request for reasons which include our excessive housing contributions to date, sustainability, lack of site availability and infrastructure issues such as parking, education and medical provision.</p> <p>Chiltern District Council’s own figures show that the percentage growth in dwellings permitted or zoned April 2006 to March 2014 was Amersham 5.3%, Chesham 4%, Chalfont St Peter Village 7.7%, and Little Chalfont 12.4% (sources and details in our March 2015 response). Little Chalfont has accepted more than its share of development without any improvement to the main infrastructure.</p> <p>There is concern in our community that the sense of place and identity, which the Revitalisation Group, Community Association and Parish Council have worked hard to develop, would be damaged by further large scale development.</p> <p>The key messages from our community, where we consulted widely, were:</p> <p>A virtually united view that none of the areas of Green Belt and AONB that surround Little Chalfont should be released for development.</p> <p>The Green Belt and AONB was frequently quoted as a principal reason for choosing to live in Little Chalfont.</p> <p>Acceptance that there is pressure for new housing and that Little Chalfont should play its part but that this should be from within its present housing boundaries, looking first to brownfield sites and then to older properties on individual plots, where some increased density can be considered (albeit with sensitivity to the surroundings and quality of design).</p> <p>Serious concerns about the inadequacy of parking, including at the station.</p> <p>The general view is that Little Chalfont has grown rapidly in recent years and that much of its infrastructure is at, or already over, capacity.</p> <p>The community response is justification for our view on the Green Belt and AONB.</p> <p>Therefore we are looking for a clear policy statement that the Local Plan will defend the</p>

		<p>AONB.</p> <p>We note that NPPF guidance on the Green Belt makes clear that unmet housing need is unlikely to outweigh the harm to the Green Belt or constitute very special circumstances that justify inappropriate development within the Green Belt. Although the NPPF policy on Green Belt does permit redevelopment of previously developed sites, in seeking suitable sites within the District, the challenge will be to ensure that any such sites are identified carefully, so that the green lungs in our settlements are preserved.</p> <p>Capacity for Growth: Over the last 50/60 years the population of Little Chalfont has grown from 2000 to 6000 and has almost reached capacity, not just in terms of land availability but because pressures on infrastructure and sustainability are at unacceptable levels. (See response to Question 16).</p> <p>There will be opportunities for new development over the period planned but they will require a creative approach to seek out suitable sites (most of which will be small but could include some targeted increases in density by the redevelopment of present individual housing plots or neighbourhoods) to contribute gradually to housing growth.</p> <p>We strongly recommend that the primary focus is given to brownfield and other non-residential sites which have either fallen into disrepair or may present future opportunities for residential use, in both Chiltern District and the neighbouring local authorities.</p> <p>(Our earlier submission on the Call for Sites sets out the potential local development sites, all of which are already known to Chiltern District Council).</p> <p>Duty to Cooperate: In protecting the character and strengths of the District, the Council should require our neighbouring Authorities to investigate the absorption of a significant proportion of Chiltern District's identified need.</p> <p>In our view, this is not about Local Authorities sharing out the identified numbers of dwellings on what may be perceived an equitable basis but an acceptance that, within Buckinghamshire (and indeed neighbouring counties and the country as a whole) the Chilterns is a hugely valuable area which should be protected for the benefit of all.</p> <p>We urge you to approach cooperation on this premise.</p>
5.3.	CS1 The Spatial Strategy	<p>Our conclusion is that the present Spatial Strategy is robust, particularly in looking at new developments <b>within</b> existing settlements.</p> <p>Allowing for changed circumstances since the Core Strategy was adopted and proposed Neighbourhood Plans, you will no doubt be considering whether or not the roles played by different settlements should change and, in this respect, we see no case to include Little Chalfont among the settlements where new development could be focused.</p> <p>This conclusion has been reached only after very careful consideration and, although we do see opportunities within our village to contribute throughout the period of the Local Plan, we cannot envisage playing a major role.</p> <p>Therefore, we seek the removal of Little Chalfont as a main settlement for growth from the Core Strategy and set out our reasons in the responses to Question 6. (These reasons, identified in the recent consultation exercise with the community, include our housing contributions to date, sustainability, lack of site availability, and infrastructure issues such as parking, education and medical provision.)</p> <p>In addition, there is deep concern within the community that the sense of place and community, into which a great deal of effort has been undertaken, would be lost, if there were to be any further major development.</p>
5.4.	CS2 Residential	<p>We reserve our comments until the outcome of the discussions with the neighbouring</p>

	Development	Local Authorities under the Duty to Cooperate are known.  We strongly recommend that the primary focus is given to brownfield and other non-residential sites that have either fallen into disrepair or which may present future opportunities for residential use, both within Chiltern District and within neighbouring Local Authorities.
5.5.	CS3 Non-Residential Development	The current policy appears to be broadly appropriate for the period up to 2036.
5.6.	CS4 Sustainability	The current policy appears to be appropriate for the period up to 2036.  Item j) of the policy recommends the inclusion of Sustainable Urban Drainage (SUDS) and, whilst this is supported, any new policy should ensure that that SUDS at no time increases the risk to the chalk aquifer and chalk streams which form the cornerstone of our AONB status.
5.7.	CS5 Renewable Energy	We have no knowledge of any central/government directives in this area but, considering the extended period to 2036, consideration may need to be given to increasing the present target of 10% for developments of more than 10 dwellings.
5.8.	CS6 Strategic Housing Allocations	With all of the three sites listed in the policy having received planning approval. This policy is no longer required.
5.9.	CS7 Major Developed Sites within the Green Belt	There is an important omission in the current policy, in that we consider that a full impact assessment on the adjacent communities should be a pre-requisite for viability.  See <a href="#">Ref 6.9</a> regarding Newland Park.
5.10.	CS8 Affordable Housing Policy	There is a need to have policies in place that reflect the requirements of each settlement, as mentioned in <a href="#">3.4</a> above.
5.11.	CS9 Affordable Housing in Rural Areas	No comment.
5.12.	CS10 Affordable Housing Type	There should be criteria in place to ensure that the different types reflect the different needs of each settlement.
5.13.	CS11 Affordable Housing Size	No comment.
5.14.	CS12 Specialist Housing	The current policy appears to be appropriate for the period up to 2036.
5.15.	CS13 National Society for Epilepsy	No comment.
5.16.	CS14 Sites for Gypsies, Travellers & Travelling Showpeople	No comment. See response to Question 9.
5.17.	CS15 Smart Growth	The current policy appears to be appropriate for the period up to 2036.
5.18.	CS16 Employment	No comment at this stage.



	Land	
5.19.	CS17 Chalfont Grove	No comment.
5.20.	CS18 District Shopping Centres	<p>The current policy appears to be appropriate for the period up to 2036.</p> <p>The designation of shopping centres subsequently proposed for other settlements were also valid and should be incorporated into the new Local Plan.</p> <p>For other than the three major shopping centres, we have a concern regarding the government’s proposals to seriously relax Use Classes. We have opposed this in a recent Government consultation as we believe that Local Authorities should have the ability to maintain control over retaining/achieving a balance of retail outlets that properly serve the particular needs of local communities.</p> <p>We are aware that high streets and shopping parades are changing in character but have no wish to see them dominated by, for instance, cafes/restaurants or charity shops, to the detriment of a good range of other outlets.</p> <p>We urge you to incorporate appropriate policies within the new Local Plan.</p>
5.21.	CS19 Supporting the Rural Economy	The current policy appears to be appropriate for the period up to 2036.
5.22.	CS20 Design & Environmental Quality	The current policy appears to be appropriate for the period up to 2036.
5.23.	CS21 Areas of Little Change	The policy should be retained and the previously proposed changes (including those for Little Chalfont) should be incorporated into the new Local Plan.
5.24.	CS22 Chilterns AONB	<p>See comments under Question 2 section 2.5 above and Question 5 section 5.2 above. In addition, we would add the following comments:</p> <p>In our view, major housing developments should never be allowed in the AONB. The National Parks and Access to the Countryside Act of 1949 defined the purpose of the AONB as ‘to conserve and enhance the natural beauty’ which is not consistent with large-scale building.</p> <p>The Countryside and Rights of Way Act of 2000 placed a duty on public bodies to ‘have regard to the purpose of the AONB’.</p> <p>In response to our own consultation, local residents have shown strong opposition to any new development in the AONB or in the Green Belt. The fundamental aim of the Government’s Green Belt policy is to prevent urban sprawl and, as noted section 2.4 above, there is a legal requirement that Green Belt boundaries should be changed only in exceptional circumstances, in order to ‘protect the green lungs around towns and cities’.</p> <p>It is sometimes argued by developers that areas of Green Belt and AONB adjacent to existing settlements are somehow less open or beautiful than those further out in the countryside. This is emphatically not so at Little Chalfont. The green spaces on the eastern borders of our village are pristine, and from within them one looks out mainly on to open, beautiful country. This enhances the enjoyment of the AONB.</p> <p>To the north of the village, between Bell Lane and Stony Lane, lies the Chess Valley, one of the most attractive and tranquil rural recreational areas in the county. Many fine walking paths into that valley begin in, or pass through, the Green Belt/AONB areas adjacent to the village; they are its natural threshold and should not be urbanised.</p> <p>As we urged earlier in this response, the Local Plan should continue to protect and keep</p>

		precious the existing AONB sites and boundaries.
5.25.	CS23 Settlements and rows of dwellings within the Green Belt	No comment.
5.26.	CS24 Biodiversity	The current policy appears to be appropriate for the period up to 2036.
5.27.	CS25 Impact of new development on the transport network	<p>The policy remains valid and should be given greater weight in the new Local Plan. Similar to our comments in 4.7 above, it should be a requirement that full impact assessments on neighbouring settlements are undertaken, not just on transport.</p> <p>We recommend that the policy should also be extended to account for the phenomenon known as 'Induced Traffic'. This is where highway improvements generate increased traffic levels which not only negate the highway improvement but have a negative impact on the environment and local communities. This should not override the need for road improvements but lead to serious consideration of other measures, such as traffic calming.</p> <p>The new Local Plan should also recognise the potential adverse effects on the District, should HS2 be implemented, particularly during the initial years of construction. (The implications for all settlements are already well known to CDC.)</p>
5.28.	CS26 Requirements of new development	No comment.
5.29.	CS27 Working for a healthier community	No comment.
5.30.	CS28 Retaining and Improving Leisure and Recreational Facilities	No comment.
5.31.	CS29 Community	The current policy appears to be appropriate for the period up to 2036.
5.32.	CS30 Reducing Crime and the Fear of Crime	The current policy appears to be appropriate for the period up to 2036.
5.33.	CS31 Infrastructure	<p>The current policy in Core Strategy terms remains valid but should be given much greater weight.</p> <p>Infrastructure in many of the District's settlements is seen to be stretched already and this is particularly noticeable in the provision of primary education and parking – the latter actually creating a threat to the vibrancy of the centres of certain settlements.</p> <p>Not only do we see the need for there to be close discussions with communities, once the Needs Assessments and allocations are drafted but we also consider that it will essential for the Council to adopt the Community Infrastructure Levy.</p> <p>The policy needs to include for the consequential impacts of developments outside the immediate settlement. For example developments in one settlement may significantly impact the transport infrastructure in a neighbouring settlement.</p>

5.34.	CS32 Green Infrastructure	The current policy appears to be appropriate for the period up to 2036.
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**Question 6** Do you have **comments on individual options generally or specific settlements/ site options that could be part of these options?**

Ref	Key Factor	Points to consider
6.1.	General	Against the background above we have the following comments on the Options in section 4.7 of the Consultation Document:
6.2.	Option A	This option is supported with the proviso that the conversion of existing employment land should not be converted into land for housing if consequentially there is a need to provide additional employment land outside of the current settlement boundaries.
6.3.	Option B	We were pleased with the proposed expansion of the former Established Residential Areas of Special Character in the Chiltern Saved Local Plan, as reviewed for the draft plan to 2026. This policy should be retained and the previously proposed changes (including those for Little Chalfont) incorporated into the new Local Plan.
6.4.	Option C	We emphatically disagree with the inclusion of Little Chalfont in the list of principal settlements. See our comments on specific site options in the Annexes below.
6.5.	Option D	No comment.
6.6.	Option E	No comment.
6.7.	Option F	No comment.
6.8.	Option G	Hard to comment until we see the suggestions. Yes in the case of the small parcel in Little Chalfont, already developed to some extent, where the Parish Council has applied for release from Green Belt for a new community centre.
6.9.	Option H	No comment.
6.10.	Option I	Extensions to other settlements such as larger villages should be permitted only if they can be achieved without the declassification of existing Green Belt and AONB.
6.11.	Option J	We are of the opinion that Little Chalfont should be removed from the list of principle sites. We do not believe further development of Little Chalfont can be described as sustainable. See answer to Question 5 above.
6.12.	Option K	We would support intensification opportunities within the edge of existing employment sites in the built up areas.  The 'Area of Search' identified in Appendix 5 occupies most of the eastern border of Little Chalfont, although it is not part of Little Chalfont parish. It is both Green Belt and AONB and should be preserved as such. See further comment under Question 6.
6.13.	Option L	See our answers above.
6.14.	Proposed Sites	Our comments on each of the proposed sites are included as annexes <b>A-E</b> . Each annex considers one of the sites proposed by CDC and SBDC for further testing. We have reviewed and comment on the specific evidence pertaining to each site. We have considered the following factors: <ul style="list-style-type: none"> <li>• Review of the definition of the area and how this appears to have been selected;</li> <li>• Housing and Economic Land Availability Assessment, Green Belt Assessment and National Planning Policy Framework aspects;</li> <li>• Environmental considerations;</li> <li>• Ancient Woodland impacts;</li> <li>• Transport and infrastructure;</li> </ul>

		<ul style="list-style-type: none"> <li>• Sustainability</li> <li>• Site specific data from the Sustainability Appraisal; and</li> <li>• Reference to the Sustainability Appraisal.</li> </ul> <p><b>It is our opinion that the Chiltern and South Bucks Local Plan Initial Consultation (Regulation 18) Incorporating Issues and Options document and the supporting evidence is NOT joined up and does NOT provide any evidence-based justification for the ‘Areas for Further Consideration at Stage 2 for Chiltern and South Bucks’.</b></p> <p><b>It is our opinion that the inability to meet the Objectively Assessed Housing Need does not constitute ‘exceptional circumstances’ for the release of Green Belt. Therefore, we reject any proposal to undertake any significant housing or economic development in or immediately adjacent to Little Chalfont. We urge Chiltern District Council to fulfil its obligations to protect and enhance the Green Belt and Area of Outstanding Natural Beauty.</b></p>
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**Question 7**      *Do you have **comments on the suggested level of unmet needs in Chiltern/South Bucks?***

Ref	Key Factor	Points to consider
7.1.		For the reasons given under Questions 1, 4 and 5 we think the unmet need is not sufficient to justify changes to the Green Belt and AONB areas surrounding Little Chalfont. This is supported by the National Planning Policy Framework (NPPF) guidance on Green Belt which states that unmet housing need is unlikely to outweigh the harm to Green Belt or constitute very special circumstances that justify development in Green Belt. This was reinforced in March 2014 when the published new web-based Planning Practice Guidance <sup>Ref 3</sup> .

**Question 8**      *Do you have any **comments or suggestions on how the councils can meet its local affordable housing need?***

Ref	Key Factor	Points to consider
8.1.		<p>Some settlements do not offer significant local employment opportunities. Many residents work in London or other major conurbations and choose to live in Chiltern District for the quality of schools, housing, good transport links and fine countryside.</p> <p>The District does need businesses for its economic viability but workforces are often drawn from outside the District, where property prices are more affordable.</p> <p>We accept the need for more affordable dwellings to support local services and communities but, for the above reasons, not all communities require affordable housing to make them sustainable. Policies, numbers and housing types should reflect the requirements of each settlement.</p> <p>Whatever the situation, we suggest that there should be evidence (by settlement) of affordable housing needs and from where the residents of such housing would come. If the demand is from within the District, then there should be policies included to restrict the availability of affordable houses to those with local credentials.</p> <p>There is an unmet demand from older children of families who, irrespective of where they work, would prefer to live in their own properties close to their families. Property prices in the District militate against this. We hope that some device can be used to make a fair proportion of affordable market homes available only to young people with local credentials (a local housing association already does this when selling its properties on the market).</p> <p>To eliminate much confusion by residents between ‘affordable housing’ and ‘affordable</p>

		market housing’, we recommend that these terms be clearly defined in all documents which use them.
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**Question 9** *Do you have any **comments on the above options to meet the needs of Gypsies, Travellers and Travelling Showpeople?***

Ref	Key Factor	Points to consider
9.1.		<p>The current identified needs are 42 pitches for travellers and 16 plots for travelling showpeople from 2013 to 2023.</p> <p>The Green Belt Briefing Paper <sup>Ref 3</sup> and the new web-based Planning Practice Guidance on Green Belt confirms that unmet housing need (including for travellers sites) is unlikely to outweigh the harm to Green Belt or constitute very special circumstances that justify development in Green Belt. The Briefing Paper <sup>Ref 3</sup> states that <i>‘The government’s planning policy is clear that both temporary and permanent traveller sites are inappropriate development in Green Belt.’</i></p> <p>We support the option: <i>Protect existing lawful sites solely for use by travellers, travellers being defined by national policy.</i></p> <p>We do not support the other options.</p> <p>We are strongly against the option: <i>New pitches/plots to be required as part of residential extensions to built-up areas comprising 100 or more dwellings.</i></p>

**Question 10** *How do you think the **Joint Local Plan can best meet specialist elderly accommodation needs, both in term of general and affordable needs?***

Ref	Key Factor	Points to consider
10.1.	General	<p>We would support the following statements included in the Consultation document:</p> <p><i>The draft HEDNA identifies a further need for specialist accommodation for older people requiring care. In order to meet such need there may be a requirement for larger housing developments to include an element of specialist elderly care accommodation as well as encouraging provision in other appropriate locations.</i></p> <p><i>Through the Duty to Co-operate the councils have been requested by the Chiltern Clinical Commissioning Group to explore the scope for requiring a proportion of elderly care homes to be provided as affordable units.</i></p> <p>The District is perceived to have a shortage of suitable accommodation for its ageing population. Policy CS12 in the Core Strategy encourages such provision but perhaps a more pro-active stance is called for within the new Local Plan, where specific sites are sought and designated.</p> <p>In certain settlements, where there are many large houses under single occupancy, meeting the need for downsizing would release such homes for younger families. Dependent upon the settlement, the need would range from affordable flats or bungalows through to large sized luxury apartments and sheltered accommodation.</p>

**Question 11** *Do you have a **view on the Heritage Strategy** – for example views on our local heritage assets, how heritage contributes to quality of life and our sense of place and community?*

Ref	Key Factor	Points to consider
11.1.	General	Green Belt land and the Area of Outstanding Natural Beauty are our most important

		heritage.  Footpaths, rights of way and their historic landscape setting also add much to the heritage.
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**Question 12** Are you aware of any **currently unprotected local heritage assets** that should be identified and if so why is the heritage asset important locally?

Ref	Key Factor	Points to consider
12.1.	General	There is a new war memorial beside Little Chalfont village green to be included as a local heritage site.

**Question 13** **Local Green Space designations** can be made as part of the Local Plan and so local residents, community groups and other local stakeholders are asked to **identify areas that they would like to be considered**. Importantly any nomination should include supporting evidence.

Ref	Key Factor	Points to consider
13.1.	General	<p>The following are very important as open green places providing recreational space and various community uses. Their loss would greatly detract from the appearance and amenity of the village. We ask for them all to be designated as Local Green Space in the new Local Plan.</p> <ul style="list-style-type: none"> <li>• The Little Chalfont Nature Park;</li> <li>• Westwood Park</li> <li>• Snell's Wood</li> <li>• The village green</li> <li>• The green area around Cavendish Close bordered to the north by Elizabeth Avenue (this is thought to be in the ownership of Paradigm)</li> <li>• The pond area in Finch Lane (adjacent to St. Aidan's Catholic Church)</li> <li>• Burtons Wood (Burtons Lane), which we record has formal Village Green status;</li> <li>• The lawn area to the front of the GE Healthcare building in the centre of the village;</li> <li>• Land between Amersham Way and the A404, including the small wood between Amersham Way and Church Grove.</li> <li>• The green area in the centre of The Retreat.</li> </ul>

**Question 14** Do you have any **nominations for Local Measures**?

Ref	Key Factor	Points to consider
14.1.	New Community Centre	Little Chalfont Parish Council and Little Chalfont Community Association plan to develop a new community centre to replace the present Village Hall which was built over 60 years ago when the population of the village was about half that of today.
14.2.	Creation of the Little Chalfont Nature Park	Little Chalfont Charitable Trust is creating a Nature Park off Cokes Lane supported by Little Chalfont Community Association and Little Chalfont Parish Council. The park is to provide an inclusive and accessible natural green space designed to incorporate a meadow and wooded area. The purpose of the scheme is to conserve and enhance the natural environment and heritage of the area and provide opportunities for informal amenity for residents. Features may include a play area made from natural materials, Disability Discrimination Act compliant pathways, teaching area, picnic area and sensory area. The resource is also to be used as a Learning Zone for schools, both local and further afield. Delivery of the scheme is to be in phases and is reliant on securing funding.

14.3.	Enhancing the appearance of the Village Centre	The Little Chalfont Community Action Plan identifies a desire to improve parking in, and the appearance of the village centre.
14.4.	Westwood Park	The park has been greatly enhanced over recent years and is now well used. The Parish Council would like to continue improvements to offer better facilities to existing users and attract additional ones. The replacement of the pavilion is planned when funds allow and other small buildings might be required in order to attract sports not represented at present.

**Question 15** Do you have a **view on the scope of policies proposed set out in Appendix 7?**

Ref	Key Factor	Points to consider
		<b>Sustainability Policies (S)</b>
15.1.	General	It is unhelpful to include in 1.3 the ambiguous statement that "policies need to...be positively prepared". A clearer explanation of intent is required.
15.2.	Sustainable Development	No comment. <b>Comment required</b>
15.3.	Settlement Hierarchy	Please see our response in section 1.3 above.
15.4.	Local Sustainable Development principles	No comment.
15.5.	Infrastructure Delivery	<p>The second sentence of the Infrastructure Delivery Policy should be strengthened by rewording it to read " The Policy will ensure that any development proceeds only where essential infrastructure already exists, or is planned and funded (and the development is phased to its delivery) or will be secured as part of the development (if directly related to the development) or through an earmarked use of a Community Infrastructure Levy (if the councils decide to introduce such a levy).</p> <p>Infrastructure in many of the District's settlements is seen to be stretched already and this is particularly noticeable in the provision of primary education and parking – the latter actually creating a threat to the vibrancy of the centres of certain settlements.</p> <p>Not only do we see the need for there to be close discussions with communities, once the Needs Assessments and allocations are drafted but we also consider that it will essential for the Council to adopt the Community Infrastructure Levy.</p> <p>The policy needs to include for the consequential impacts of developments outside the immediate settlement. For example developments in one settlement may significantly impact the transport infrastructure in a neighbouring settlement.</p>
15.6.	Renewable and Low Carbon Energy	No comment.
		<b>Design Policies (D)</b>
15.7.	Design	No comment.
15.8.	Amenity	No comment.
15.9.	Basement Development	The second sentence on Basement Development should be extended to end "if well designed and constructed."

<b>Green Belt Policies (GB)</b>		
15.10.	General	Bullets 3 and 5 of paragraph 89 of the NPPF are covered, but it is odd that policies on bullets 1 (buildings for agriculture and forestry), 2 (facilities for outdoor sport, recreation etc. - only partly within the Rural Economy policy), 4 (replacements) are not specified.
15.11.	Development in the Green Belt	The first sentence should refer to "clarifying areas (to be) <u>added or removed</u> " This policy should include a repetition of the requirement that "The Chilterns Area of Outstanding Beauty Design Guide should be followed within the Chilterns AONB section of the Green Belt which can impact on the setting or appearance of the AONB." See response to Question 2, section 2.4 above.
15.12.	Affordable Housing Exceptions Policy	<b>No comment.</b>
15.13.	Infilling within Rows of Development within Green Belt	In accordance with para 89 of NPPF, limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
15.14.	The Rural Economy	No comment.
15.15.	Rural Workers Dwellings	No comment.
15.16.	Extensions to Dwellings and Outbuildings in the Green Belt	The policy should read "A policy to provide local guidance on paragraph 89 (bullet 3) of the NPPF."
<b>Housing Policies (H)</b>		
15.17.	Housing Proposal Sites	Level of housing density should be in keeping with adjacent areas.
15.18.	Housing Mix	It is our view that the existing demographics of the community should dictate the housing mix.
15.19.	Affordable Housing and Starter Homes	No comment.
15.20.	Custom Build and Self Build Housing	No comment.
15.21.	Residential Uses	No comment.
15.22.	Specialist Elderly Person Accommodation	The first sentence of the policy on Specialist Elderly Person Accommodation is background justification, not a policy, which should either be removed or linked with the current second sentence, so that the policy reads "Since evidence indicates that the districts have a growing elderly population and have a specific identified need for care homes in the HEDNA, the Plans will actively encourage ...." For clarity of intention, the intended meaning of "large scale developments" should be included.



15.23.	Detached Residential Annexes	No comment.
15.24.	Gypsy, Traveller and Travelling Showpeople Accommodation	No comment. See response to Question 9.
		<b>Economic Development (ED)</b>
15.25.	Smart Growth	No comment.
15.26.	Employment Land	This policy should be clarified by adding "both initially and in the future" to the end of the sentence.
15.27.	Chesham Employment Restructuring	No comment.
15.28.	Live-Work Units and Home Working	There is no statement of any policy, just background information on the reasons for the need for a policy.
15.29.	Opportunity Proposal Sites	We agree with this policy but we recommend reference to the development of appropriate infrastructure should be included in the measures.
		<b>Town Centre (TC)</b>
15.30.	General	We strongly believe that there is a need for an additional policy on changes of Use Classes. It is vital to have the ability to maintain control over retaining/achieving a balance of retail outlets that properly serve the particular needs of local communities. (We are aware that high streets and shopping parades are changing in character but have no wish to see them dominated by, for instance, cafes/restaurants or charity shops, to the detriment of a good range of other outlets.) See section 5.20 above.
15.31.	Town and Local Centres and Town Centre Uses	No comment.
15.32.	Shopping Frontages	No comment.
15.33.	Rear Servicing in Town and Local Centres	No comment.
		<b>Historic Environment (HE)</b>
15.34.	Conserving and Enhancing the Historic Environment	No comment.
		<b>Natural Environment (NE)</b>
15.35.	Biodiversity	No comment.
15.36.	Chilterns AONB	This is a laudable policy which appears not to have been followed in the current Green Belt Assessment.  See response to Question 2, section 2.5 above.

15.37.	Burnham Beeches	No comment.
15.38.	Green Infrastructure	No comment.
15.39.	Flood Protection SuDS	This should be extended to include protection of the natural chalk aquifers.
15.40.	Chesham Flood Alleviation Project	No comment.
15.41.	River Character and the Water Environment	No comment.
15.42.	Trees and Woodland	No comment.
		<b>Transport Policies (T)</b>
15.43.	Transport Impact from New Development	No comment.
15.44.	Transport Proposals	A policy to specify the extent and nature of transportation development required both for identified inadequacies in current provision and for the delivery and timing of new developments.
15.45.	Iver HGV	No comment.
15.46.	Development within the HS2 Safeguarded Area	No comment.
15.47.	Parking Standards	The policy should be strengthened by expanding the second paragraph to cover maintenance/enforcement so that it reads "This policy will provide specific parking, disabled parking and cycling standards to be achieved and maintained in new developments in the Plan area."  Parking provision in the proximity of stations should not be reduced.
		<b>Healthy Communities (HC)</b>
15.48.	Community Facilities	No comment.
15.49.	Sports, Recreation and Leisure Facilities	No comment.
15.50.	Local Measures	No comment.
15.51.	Public Open Spaces and Local Green Spaces	No comment.

**Question 16** *Do you have any comments on the Settlement Infrastructure Capacity Study, infrastructure needs or issues and CIL?*

Ref	Key Factor	Points to consider
16.1.	Chiltern and South Bucks Settlement and Infrastructure Capacity Study Ref 11	<p><a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7749&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7749&amp;p=0</a></p> <p>Generally we find the study inadequate for its purpose (see below), but the specific information in the Settlement Findings on Little Chalfont gives cause for acute concern.</p>
16.2.	Education	<p>The findings identify a deficit of primary school places by 2018, and of secondary school places by 2022 in relation to existing housing growth, and no current capacity to address future growth beyond this.</p> <p>The study points to only very limited scope for installing more capacity due to pooling of section 106 contributions. Bucks County Council say that CIL needs consideration for delivering this type of infrastructure.</p> <p>In this context we would also draw attention particularly to paragraphs 44 and 45 of the main Study.</p> <p>Clearly no new housing developments of any significant size should be permitted in the Little Chalfont catchment area until necessary additional school places have been provided.</p>
16.3.	Health	<p>Sufficient information has not yet been provided by the authorities concerned, but the Study comments that there is very limited scope for improvement due to the pooling of section 106 contributions, and notes that this type of infrastructure could be covered by CIL. Capacity is usually assessed on a five year basis and does not currently account for potential growth associated with the new Local Plan.</p> <p>It is obvious to anyone who uses local GP services that they are under excessive pressure now.</p> <p>No new housing developments of any significant size should be permitted in or immediately adjacent to Little Chalfont until capacity has been increased to match any planned population growth.</p>
16.4.	Transport	<p>It is disappointing that the study does not mention the serious parking problems which affect Little Chalfont village centre, the high street shops and station.</p> <p>Many commuters, some unwilling to pay for a space in the station car park and others unable to find empty spaces, are already parking in numbers in residential streets. With little opportunity to create additional parking, the situation will worsen with the new housing already planned and would worsen further if any more substantial development were permitted. This would reduce the attractiveness of Little Chalfont as a place to live.</p> <p>The upward trend in car ownership is likely to continue and any significant level of new housing will make the District less attractive to visitors.</p> <p>Core Strategy Policy CS 25 remains valid and should be given greater weight in the new Local Plan. It should be a requirement that full impact assessments on neighbouring settlements are undertaken, not just on transport.</p> <p>We recommend that the policy should also be extended to account for the phenomenon known as 'Induced Traffic'. This is where highway improvements generate increased traffic levels which not only negate the highway improvement but have a negative impact on the environment and local communities. This should not override the need for road improvements but lead to serious consideration of other measures, such as traffic calming.</p> <p>The new Local Plan should also recognise the potential adverse effects on the District,</p>

		should HS2 be implemented, particularly during the initial years of construction. (The implications for all settlements are already well known to CDC.)
16.5.	Utilities – Drinking Water	We note the information that there is no new water available for new drinking water abstraction in CDC area. The measures listed under ‘scope for capacity improvements’ should be taken before housing developments of any size, or new employment sites, were introduced.
16.6.	Sustainable Urban Drainage	Item j) of Core Strategy policy CS4 recommends the inclusion of Sustainable Urban Drainage (SUDS) and, while this is supported, any new policy should ensure that SUDS at no time increases the risk to the chalk aquifer and chalk streams which form the cornerstone of our AONB status.
16.7.	Social Care	It is clear from the limited information in the Study that more work needs to be done urgently on assessing the needs of each settlement.
16.8.	CIL	We have inadequate information to comment on whether or not the councils should adopt the Community Infrastructure Levy. If CIL is adopted, we urge the councils to hypothecate the CIL to remedy existing infrastructure at the development site or address deficiencies which will be made more severe by the new development.
16.9.	General	<p>The opening paragraph of the Study defines its aim to be "to assess the scope of different settlements for accommodating the potential for new growth associated with the new Local Plan, including the capacity of existing infrastructure, whether there were particular trigger points where infrastructure capacity would be reached and whether infrastructure improvements could enhance capacity". Paragraph 14 then expands on this aim by recording that "one of its main purposes was (is) to identify settlement infrastructure capacity and trigger points for specific settlements linked to different preliminary growth scenarios (not just limited to housing)". However, this Study has gathered totally inadequate data to achieve this aim, with vast swathes of infrastructure issues identified with a status "insufficient information is currently available either at the District or the settlement level. Therefore the Study fails to achieve its intended purpose.</p> <ul style="list-style-type: none"> <li>• Similarly, on page 9 of the Study it is noted that the Study aims to establish information from key infrastructure providers and can be summarised in relation to these main questions;</li> <li>• Is the existing settlement infrastructure sufficient or is there an infrastructure deficit?</li> <li>• Is there scope for additional growth without impacting on infrastructure capacity?</li> <li>• If so, how much growth could be accommodated (and over what timescale)?</li> <li>• At what levels of growth would new or improved infrastructure be required and what would this comprise?</li> <li>• If new infrastructure is needed, particularly to cater for growth, how can it be delivered?</li> <li>• Again, the Study falls well short of answering these questions, with only generalised (and unsurprising) conclusions such as:             <ul style="list-style-type: none"> <li>• - "For example roads, railways, GPs, water infrastructure and education are particular areas where capacity is either (sic) under pressure already." (para 9)</li> <li>• - "The overall impression is that all of the settlements have considerable existing infrastructure pressures. (para 35)</li> <li>• - "In relation to the local road network the latest Bucks County Local Transport Plan 3 shows that most main routes across the districts are already congestion ‘hot spots’ at peak times." (para 36)</li> </ul> </li> </ul> <p><b>In summary, there is no dispute that "it is important to look at potential critical infrastructure issues at the early stages of plan preparation and evidence gathering</b></p>

		<b>because this could have a fundamental impact on whether the policies and proposals in the new Local Plan are realistic, deliverable and can be implemented so that new development is accompanied by supporting infrastructure, implicit within the need for new development to be sustainable"(para 1). However, this Study fails to make any significant progress in this vital process.</b>
16.10.	Differentiating Factors for Little Chalfont	<p>The Chiltern and South Bucks Settlement and Infrastructure Capacity Study <sup>Ref 11</sup> does not take into consideration some key factors which would have a significant impact on Little Chalfont.</p> <p>The A404 is a main arterial route through the centre of Little Chalfont which is already subject to significant peak hour congestion. Any development in or around Little Chalfont will result in an increase in traffic levels on the A404. Not only will this increase noise and environmental pollution it will deter parents and their children from walking to the local schools/ shops. This in turn will increase traffic levels further as people will feel safer travelling by car.</p>

**Question 17** *Do you have **any other points** you would like the Council to take into account in the preparation of the Joint Local Plan? For example are there any challenges or opportunities you think the new Joint Local Plan will need to address?*

Ref	Key Factor	Points to consider
17.1.	Open Space & Recreation Strategy	The present strategy for Little Chalfont remains valid and we are aware that it is due for review in 2018. We highlight that Appendix 4 (Audit) of the strategy states that Little Chalfont has adequate provision of allotments. We confirm that Little Chalfont does not have any allotments.
17.2.	Major Developed Sites within the Green Belt	There is an important omission in the current policy, in that we consider that a full impact assessment on the adjacent communities should be a pre-requisite for viability. This applies in particular to Newland Park.
17.3.	Renewable Energy	We have no knowledge of any central/government directives in this area but, considering the extended period to 2036, consideration may need to be given to increasing the present target of 10% for developments of more than 10 dwellings.
17.4.	Sustainability Appraisal of the Chiltern and South Bucks Local Plan <b>SA Scoping Document</b> <sup>Ref 12</sup>	<p><a href="http://www.southbucks.gov.uk/CHttpHandler.ashx?id=7688&amp;p=0">http://www.southbucks.gov.uk/CHttpHandler.ashx?id=7688&amp;p=0</a></p> <p>Refer to section 1.6.4. <i>'Environmental Assessment is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision making.'</i> Given that the key environmental consideration for Little Chalfont is the protection of the Green Belt and AONB we recommend that this appraisal is in place before any consideration is given to amending Green Belt boundaries or impacting AONB.</p> <p>Refer to section 2.3.3. We are of opinion that specific data needs to be available for the appraisal to be commensurate with any assessment of proposed development sites. We believe this to be inappropriate as regional and district level data is not of a high enough spatial resolution and quality to accurately base long term planning decision on and contradicts the notion of sustainability and the NPPF in the requirement that future development needs to be appropriate to the context of local areas. We feel that the spatial resolution of maps and data is not of a high enough quality for a true and accurate appraisal of individual locations. We recommend that the appraisal should utilise the parcels of land considered as part of the Part 1 Green Belt Assessment.</p> <p>Refer to section 11.2.13. In our opinion AONB is not given adequate consideration and we are of the opinion that AONB sites should be excluded from the sites for testing</p>

		<p>Refer to section 3.1. A cornerstone of any development must include Accessibility and Transport. This section requires local transport authorities to develop a robust evidence base when transport planning. It is clear that a key assumption in an appraisal of the sustainability of Little Chalfont is the access to rail services into London and access to the M25. TfL has recently introduced new rolling stock on to the Metropolitan Line and a small increase in train frequency is planned to be in place by 2022. However the service is already standing room only at peak times and this is unlikely to change. The A404 through Little Chalfont is regularly subject to very significant congestion, not only in peak hours. There do not appear to be any publically available plans to mitigate even the current infrastructure deficit nor to consider any feasibility options to take account of the impact of the proposed development. <b>We are of the opinion that these two factors do not support the sustainability of further development in or immediately adjacent to Little Chalfont.</b></p> <p>Refer to section 5.2.18. <i>‘It will be a key objective of the Plan to ensure that no development will directly impact upon the designated and protected sites.’</i> <b>We fully support this objective and question why CDC and SBDC are not supporting this objective. The Part 1 Green Belt Assessment has concluded that the parcels of land assessed meet one or more of the criteria for designation as Green Belt. We do not understand why CDC are pursuing a flawed methodology for a Part 2 Green Belt Assessment.</b></p>
17.5.	Environment Agency’s Consultation Response	<p>We support the environment agency’s consultation response to the sustainability appraisal (LC-216- 8/01/2016) on the 3 points below:</p> <p><i>1. Chapter 5; “There is no mention of watercourses and their habitats (‘blue’ infrastructure), other wetland habitats or biodiversity networks in this chapter; these elements form a key part of biodiversity in the region and should not be omitted”</i></p> <p>We are of the opinion that the Chess valley is a key local amenity for, health, wellbeing, ecology and biodiversity and economic gains. It should therefore be excluded from further assessment.</p> <p><i>2. Chapter 6; “We are concerned that this chapter has not addressed the serious issue of effects on water resources because of climate change impacts. We recommend that ‘Impacts on water resources’ has its own sub-heading within this chapter to further discuss and review the potential impacts on water resources. This is particularly important because the entire south-east region is ‘water stressed’. This includes the impact of climate change on Chalk Rivers. Both the Misbourne and the Chess are failing under WFD for flow, suffering low flows mainly due to drinking water abstraction.”</i></p> <p>We are of the opinion that not enough regard is being given to the impact of development on the chalk aquifer, as this will have long term implications for health and ecology.</p> <p><i>3. Chapter 6: Flooding: “The flooding section is not specific about the flood risk in the Local Plan area” and “We do not feel there is enough detail about responsibilities for dealing with flooding”</i></p> <p>We agree with the environment agency that not enough adequate regard is given to flooding – this is the most significant natural hazard in England and needs to be treated with the proper consideration that it deserves, particularly in light of the future impacts of climate change.</p> <p>We believe that this directly disregards the UK Governments commitment to strategic flood risk management under the Water Resources Act 2010 and contradicts the policies in the NPPF with regards to flooding. Flood risk is not adequately assessed across the entire local plan area. It is not specified as to what scale of development SuDs will be enforced at. Overall greater consideration needs to be given to flooding over the entire</p>

		<p>plan area.</p> <p>With specific regards to little Chalfont, we do currently experience surface water flooding (albeit minor) but it is crucial that all new developments no matter what the scale should not further exacerbate the issue.</p>
17.6.	<p>Sustainability Appraisal of the Chiltern and South Bucks Local Plan <b>Initial Consultation (Regulation 18) Incorporating Issues and Options</b> <sup>Ref 13</sup></p> <p>General</p>	<p><a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7791&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7791&amp;p=0</a></p> <p>The Sustainability Appraisal aims to provide a high level appraisal of reasonable alternatives being considered as part of the planned consultation on the Local Plan. Although it is long and detailed, <b>the report is inconclusive and there are significant deficiencies in the methodology.</b></p> <p>We do not support the notion suggested by this appraisal that the loss of cultural heritage and landscape is equal to transport and housing gains. In addition there are negative impacts to health, climate change adaptation and biodiversity. We are of the opinion that the combination of negative factors outweighs the benefits.</p> <p>Section 11.2.3 excludes areas that are designated AONB but then goes on to assess sites in or immediately adjacent to Little Chalfont that are AONB.</p> <p>The appraisal attempts to determine the strength of <i>character</i> and <i>intactness</i>. There is no explanation as to how this has been scored. We are of the opinion that <i>character</i> and <i>intactness</i> are related to public amenity value and are probably best assessed by the public. Our questionnaire in Jan 2015 elicited a clear response from our community that they value the amenity of the open spaces around Little Chalfont.</p> <p>It is claimed that the appraisal process uses the SA Framework to assess each site. In practice, the analysis fails to address the questions set out in Appendix A. For example, for the <b>SEA Objective "Landscape"</b> the questions specified, but not addressed, for the decision-making criterion are: "Will it safeguard and enhance the character of the landscape and local distinctiveness and identity? Q2b Will it protect and enhance visual amenity, including light and noise pollution? Q2c Will it reuse degraded landscape/townscape? Q2d Will it compromise the purpose of the Green Belt e.g. will it lead to coalescence of settlements and/or urban sprawl? Q2e Will it protect and enhance the characteristics and setting of the Chilterns AONB and/or Colne Valley Regional Park?"</p> <p>The SA confirms that a high proportion of residents (39.3%) in Chiltern travel to work by car or van and that there is a heavy dependency on personal car use. The rates of commuting by bus is lower than the County, Regional and National averages. The SA suggests that this might be due to bus services being sporadic.</p> <p>Similarly, the Indicators for the <b>SEA Objective "Transport"</b> include frequency of bus services and distances to amenities, bus routes etc. In the analysis, bus frequency is not analysed and paragraph 2.6.5 states "Distances have been measured from the centre of the site to the centre of the receptor. This has been measured as the crow flies, as it is not possible to know the routes of roads and footpaths through the development sites at this stage." This approach reveals three serious flaws : (a) for large sites, measurement from the centre of the site will clearly not reflect the distance from the edge of the site furthest from the receptor; (b) to comply with Barton (Barton et al, 2010), as claimed, the distances should be assessed/measured as the distance for travelling, and crow flying distances must provide seriously underestimated values for actual travelling distances; (c) the absence of knowledge of the roads and footpaths is indicative of a more general failure to address the ease of access to the sites. While (a) and (b) could have been (but were not) addressed by adjustment to the Barton recommendations, the ease of access to the site would have been an important factor in addressing the two questions specified for the decision-making criterion for the SEA Objective "Transport" viz Will it reduce the need to travel? Will it provide adequate means of access by a range of</p>

		<p>sustainable transport modes (i.e. walking/cycling/public transport)?</p> <p><b>We are of the opinion that these are significant deficiencies.</b></p> <p>In a review of the detail of the Areas of Search for Little Chalfont, we have identified the following errors and omissions, disregarding the abuse of the Barton measurement methodology.</p>
17.7.	<b>Housing Site 1</b>	<p>Refer to section 3.23.4: Much but not all of the site is within 1 km of Chalfont &amp; Latimer station even "as the crow flies";</p> <p>There is one bus stop that may be within 200m of part of the site "as the crow flies", and the service provides once an hour service to Watford or High Wycombe;</p> <p>The development is likely to increase the chronic road congestion on the A404 so may well increase the district's contribution to climate change.</p> <p>Refer to section 3.23.8: The nearest accident and emergency hospitals are either about 13 miles (Hillingdon) or 17 miles (Stoke Mandeville) from the site. Mount Vernon Hospital, which offers a minor injuries service, is about 8 miles from the site.</p> <p>The sporting facilities are at Westwood Park, not "Little Chalfont Park"</p>
17.8.	<b>Housing Site 2</b>	<p>Refer to section 3.24.4: Much but not all is within 1 km of Chalfont &amp; Latimer station, even "as the crow flies";</p> <p>There is only one bus stop that may be within 200m of part of the site "as the crow flies", and the service provides once an hour service to Watford or High Wycombe (Mon- Sat, 7am to 7pm);</p> <p>The development is likely to increase the chronic road congestion on the A404 so may well increase the district's contribution to climate change.</p> <p>Refer to section 3.24.8: The nearest accident and emergency hospitals are either about 13 miles (Hillingdon) or 17 miles (Stoke Mandeville) from the site. Mount Vernon Hospital, which offers a minor injuries service, is about 8 miles from the site.</p> <p>The sporting facilities are at Westwood Park, not "Little Chalfont Park"</p>
17.9.	<b>Housing Site 3</b>	<p>Refer to section 3.25.4: The site is within 1 km of Chalfont &amp; Latimer station "as the crow flies", but its inaccessibility indicates that the distance will be greater by a proper Barton measurement foot or car;</p> <p>There are bus stops that may be within 200m of part of the site "as the crow flies", but they provide only a once an hour service to Watford or High Wycombe (Mon- Sat, 7am to 7pm) or a once every 2 hours service to Amersham and Chesham [not Little Chalfont, as recorded] (Mon-Fri, 8am - 4pm);</p> <p>Refer to section 3.25.8: Services are limited at Amersham General Hospital, the only hospital possibly just within 5 km of the site "as the crow flies". The nearest accident and emergency hospitals are either about 13 miles (Hillingdon) or 17 miles (Stoke Mandeville) from the site. Mount Vernon Hospital, which offers a minor injuries service, is about 8 miles from the site.</p> <p>The sporting facilities are at Westwood Park, not "Little Chalfont Park".</p>
17.10.	<b>Employment Site 1</b>	<p>Refer to section 4.7.4: The site is within 1 km of Chalfont &amp; Latimer station "as the crow flies", but its inaccessibility indicates that the distance will be greater by foot or car;</p> <p>The site is not within 1 km of Amersham station;</p> <p>There is one bus stop that may be within 400m of part of the site "as the crow flies", and the service provides only once an hour service to Watford or High Wycombe (Mon- Sat, 7am to 7pm);</p>



		<p>The development is likely to increase the chronic road congestion on the A404 so may well increase the district's contribution to climate change.</p>
17.11.	<b>Employment Site 2</b>	<p>Refer to section 4.8.4: The site is within 1 km of Chalfont &amp; Latimer station "as the crow flies", but its inaccessibility indicates that the distance will be greater by foot or car;</p> <p>The reference to the site being within 1 km of Amersham station is incorrect;</p> <p>There are bus stops that may be within 400m of part of the site "as the crow flies", but they provide only a once an hour service to Watford or High Wycombe (Mon- Sat, 7am to 7pm) or a once every 2 hours service to Amersham and Chesham [not Little Chalfont, as recorded] (Mon-Fri, 8am - 4pm);</p> <p>The development is likely to increase the chronic road congestion on the A404 so may well increase the district's contribution to climate change.</p> <p><b>The appraisals of the sites in or immediately adjacent to Little Chalfont should be corrected to reflect these points, and their inclusion as Areas for Further Consideration reviewed.</b></p>
17.12.	Pre and Post Mitigation Assessments	<p>The SA collates the pre-mitigation assessment matrix in Table 5.1. Section 5 sets out mitigation measures that can be taken and then the SA concludes with the Post-mitigation assessment matrix in Table 5.2.</p> <p>In our opinion the mitigation measures considered are wholly inadequate. They are often generic and in a number of cases could not be implemented. There is no evidence of any attempt to weight or scale the effect of the proposed mitigation and yet between Tables 5.1 and 5.2, 99% of the assessment scores move from 'Adverse' to 'Positive'. <b>In our opinion this methodology and the implementation of the methodology, is flawed and as a result the Sustainability Appraisal is not fit for purpose.</b></p>
17.13.	Annexes to Question 6	<p><b>Our consultation response includes annexes to question 6. Each annex considers one of the sites proposed by CDC and SBDC for further testing. We have reviewed and comment on the specific evidence pertaining to each site. We have considered the following factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Review of the definition of the area and how this appears to have been selected;</b></li> <li>• <b>Housing and Economic Land Availability Assessment, Green Belt Assessment and National Planning Policy Framework aspects;</b></li> <li>• <b>Environmental considerations;</b></li> <li>• <b>Ancient Woodland impacts;</b></li> <li>• <b>Transport and infrastructure;</b></li> <li>• <b>Site specific data from the Sustainability Appraisal; and</b></li> <li>• <b>Reference to the Sustainability Appraisal.</b></li> </ul> <p><b>It is our opinion that the Chiltern and South Bucks Local Plan Initial Consultation (Regulation 18) Incorporating Issues and Options document and the supporting evidence is NOT joined up and does NOT provide any evidence-based justification for the 'Areas for Further Consideration at Stage 2 for Chiltern and South Bucks'.</b></p> <p><b>It is our opinion that the inability to meet the Objectively Assessed Housing Need does not constitute 'exceptional circumstances' for the release of Green Belt. Therefore, we reject any proposal to undertake any significant housing or economic development in or immediately adjacent to Little Chalfont. We urge Chiltern District Council to fulfil its obligations to protect and enhance the Green Belt and Area of Outstanding Natural Beauty.</b></p>

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## Annexes to Question 6

### ANNEX A

**BUILT AREA EXTENSION OPTION: LAND AT STONY LANE. HELAA site CD0 135. Green Belt Assessment (GBA) General Area 22a. Site is both Green Belt and AONB.**

**We oppose release from the Green Belt and any development on this site. There are no exceptional circumstances to justify release.**

#### Evidence

- HELAA history. Excluded at Stage 1 with comment: *Green Belt site – not PDL. Site is also adjacent to an Ancient Woodland.* Not included in the 'Call for Sites Nominations' in HELAA App.10.

#### NPPF Green Belt Purposes

- GBA scores for general area 22a serving Green Belt purposes are high (Purpose 1 – 3/5, Purpose 2 – 5/5, Purpose 3- 5/5, Purpose 4 – 0/5).
- The site should be removed from the map of areas for further consideration in Part 2 of the Green Belt Assessment. Para 4.3.4 (page 44) of the Bucks Green Belt Assessment - Methodology paper states *A rule of thumb was applied, whereby any General Area scoring strongly against the criteria for one or more NPPF purpose was judged to be meeting the purposes strongly overall and therefore deemed unsuitable for further consideration in Part 2 of the Green Belt Assessment.* This general area scored 5/5 for two Purposes, so under the 'rule of thumb' the site is unsuitable for further consideration.
- For reasons not explained in public, General Area 22a in the GBA Stage 1 assessment was divided up further in Map 6.1b, Areas for Further Consideration at Stage 2 of the Green Belt Assessment, isolating a smaller area (shaded on the Stage 2 map) which comprises the Stony Lane site and Westwood Park. The intention appears to be to suggest that this smaller area is weaker Green Belt than the rest of Area 22a, but no justification for this is given and we strongly reject such a suggestion. In our view the Stage 2 Assessment will be invalid if the reasons for breaking up this parcel are not explained to the public during the consultation period, in good time for us to review and comment on them.
- In view of the above the site should be removed from the map of options for testing in Appendix 2 of the Issues and Options Document. No justification has been given for its inclusion and none is evident.

#### AONB

- Meeting the Green Belt purposes should alone justify protection of the site. The site is also in the AONB. The National Parks and Access to the Countryside Act of 1949 defined the purpose of the AONB as 'to conserve and enhance the natural beauty', which in our view is not consistent with large scale building. The Countryside and Rights of Way Act of 2000 placed a duty on public bodies to 'have regard to the purpose of the AONB'.
- The site is surrounded on two sides by pristine countryside, and on one by Westwood Park, all of which are in the AONB. The view of the site from those areas enhances the enjoyment of the AONB within them, which would therefore be reduced by development of the site.

#### Ancient Woodland

- The site is on the edge of Ancient Woodland. Building closer to Ancient Woodland would diminish the amenity value of that woodland and put it at risk from pollution, root damage and water table changes. There would also be a detrimental impact on wildlife dependent on the woodland. See the government website <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

### Recreation/Amenity

- There is a public right of way through the northern part of the site, which is well used throughout the year, but particularly so during the summer.
- A few yards inside the Ancient Woodland and parallel with the northern boundary of the site there is a beautiful right of way which is one of the most used recreational routes in the area. The view from this path would be damaged by development of the site. This path, and Stony Lane, provide access to the Chess Valley Walk, a promoted long distance walking route.

### Environment

- Like other undeveloped areas near Little Chalfont this site is important as water drainage land feeding the chalk streams which are already impacted by extraction of water from the Chilterns. The rivers Chess and Misbourne already suffer from dryness in places. Further urbanisation in the area will worsen this problem.

### Infrastructure/Transport

- Stony Lane is narrow and winding. It already forms a traffic bottleneck for access to the A 404 at busy times. Housing on the site would make this worse.
- This site is too far from shops, healthcare and other facilities for residents to walk. Cars would therefore be used exacerbating parking problems and traffic congestion in the village.
- Little Chalfont lacks the infrastructure (schools, healthcare, parking) to absorb any more large developments.

### Sustainability

- Refer to section 3.23:4 of the Sustainability Appraisal. Much but not all of the site is within 1 km of Chalfont & Latimer station even "as the crow flies";
- There is one bus stop that may be within 200m of part of the site "as the crow flies", and the service provides once an hour service to Watford or High Wycombe;
- The development is likely to increase the chronic road congestion on the A404 so may well increase the district's contribution to climate change.
- Refer to section 3.23.8: The nearest accident and emergency hospitals are either about 13 miles (Hillingdon) or 17 miles (Stoke Mandeville) from the site. Mount Vernon Hospital, which offers a minor injuries service, is about 8 miles from the site.
- The sporting facilities are at Westwood Park, not "Little Chalfont Park"

### **Points noted from the site evidence in the Sustainability Appraisal document, Section 3.23**

- Latimer Park, a Grade II registered park and garden, is located immediately north of the site along with a conservation area. **There is an Archaeological Notification Site located within the site.** Development may lead to loss or damage to all or part of this feature (Sustainability Appraisal Objective 1 Cultural Heritage: *It is assumed that all historic statutory designations, including listed buildings, will not be lost to development.*)
- Site is AONB. Development will change the character from rural to urban edge.
- Development will lead to loss of Green Belt
- Mature hedgerows border the site on the east and west boundaries, with ancient replanted woodland to the north. Development is likely to result in loss of mature hedgerows. Other habitats and species of principal importance may also be lost as a result of development. Local Wildlife Site adjacent to the northern boundary; impact on this should be considered (Sustainability Appraisal Objective 3: Biodiversity)
- Site lies within strategic Green Infrastructure (GI) network shown on map in Biodiversity and Planning in Buckinghamshire. Loss of GI likely to have negative effect with regard to climate change (GI benefits local

cooling) and health (providing an attractive public realm); Sustainability Appraisal Objectives 5 (missing from SA document) and 11 Health.

**Some general points relevant to above from Sustainability Appraisal Scoping Document by Lepus Consulting**

5.1.1 The objectives of policies and plans at all levels, focus on the conservation of biological diversity (including a reduction in the current rate of biodiversity loss), and the protection and monitoring of endangered and vulnerable species and habitats. In general, emphasis is also placed on the ecological importance of brownfield sites, geodiversity, enhancing areas of woodland and other important habitats. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated.

5.1.4 The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future.

5.2.16 The Chilterns AONB is a landscape designation with strong associations with biodiversity.

5.2.18 It will be a key objective of the Plan to ensure that no development will directly impact upon the designated and protected sites, however there may be indirect impacts. The Chilterns AONB Management Plan (2008-2013) identifies a number of policies and actions to manage sites through habitat mapping. The Management Plan also recognizes the need to develop consistent approaches to understand the biodiversity resource at county level, across the district boundaries.

## ANNEX B

**BUILT AREA EXTENSION OPTION: LAND WEST OF LODGE LANE, SOUTH OF THE RAILWAY, LITTLE CHALFONT.**  
**HELAA site CD0082. Green Belt Assessment (GBA) general area 35.** The land is at present mixed use, including the former golf course in the north, the employment area in the middle and enclosed paddocks and fields to the south, interspersed with concentrated woodland areas. The whole site is Green Belt, and visible from the AONB on the other side of Lodge Lane.

**We oppose release from the Green Belt and any further development on this site. There are no exceptional circumstances to justify release.**

### Evidence

- HELAA history: Excluded at Stage 1 with comment: *Green Belt site – not PDL. Not included* in Appendix 5 (Sites deemed Suitable, Available and Achievable at Stage 2 Assessment). Included in Appendix 10 (Call for Sites Nominations).
- GBA scores for General Area 35 serving Green Belt purposes are low except for Purpose 3 *Assist in safeguarding the countryside from encroachment*; score 3/5. We reject some of the scores awarded. On purpose 1, this land parcel is at the edge of a distinct large built up area, so the marking should be 'Pass' not 'Fail'. On Purpose 2 we propose changing the score to at least 2/5, as the principle of avoiding merger with Chorleywood is important and development on the site would be a significant move towards that merger. Lodge Lane is not an A or B road, so not an effective barrier. The site meets the Green Belt Purposes well. It is also adjacent to the AONB, so that the view from within the AONB which enhances its 'natural beauty' (National Parks and Access to the Countryside Act 1949) would be damaged by further building on the site.
- We object to the treatment of General Areas 29 and 35 in Map 6.1b, Areas for Further Consideration at Stage 2 of the Green Belt Assessment. General Area 29 appears to have been broken up by division along Lodge Lane. The western part of the area has been identified as an option suitable for testing for housing, and extended along Roughwood Lane which is not by the remotest stretch of the imagination an effective barrier, or a road which could accommodate traffic from new housing. No reason has been given in public for breaking up parcel 29 in this way. The intention appears to be to suggest that this western area is weaker Green Belt than the rest of Area 29, but no justification for this is given and we strongly reject such a suggestion. In our view the Stage 2 Assessment will be invalid if the reasons for breaking up this parcel are not explained to the public during the consultation period, in good time for us to review and comment on them.
- Extended development in Area 29 along Lodge Lane and even Roughwood Lane, as above, would further damage the environmental and access qualities of the site in Area 35.

### Planning History

- The green land north of Long Walk has been the subject of planning applications CH/1979/0103/FA - Refused: 'inappropriate development in the green belt and would extend and intensify the existing ribbon development along Long Walk, which is an open and rural zone important in preventing the merging of the settlements of Little Chalfont and Chorleywood'; and CH/2011/0275/FA - refused on the usual Green Belt grounds.
- Ownership of the site is complex. There are dwellings within the site including, we have been told, tenancies. These factors could complicate development.

## Environment

- The site, with its trees, open green land, grazing and paddocks, forms a charming scene on the margins of Little Chalfont, projecting tranquillity where it penetrates well into the village. Its loss would do great damage to the amenity of the houses in Village Way, Loudhams Wood Lane, Burtons Lane and Long Walk.
- Like other undeveloped areas near Little Chalfont this site is important as water drainage land feeding the chalk streams which are already impacted by extraction of water from the Chilterns. Further urbanisation in the area will worsen this problem.

## Ancient Woodland

- There is unbroken woodland from West to East on the site, including Ancient Woodland and hedgerows which act as a corridor for wildlife, including birds, deer, bats, field mice, butterflies, insects, etc. This needs protection.
- Building closer to Ancient Woodland would diminish the amenity value of that woodland and put it at risk from pollution, root damage and water table changes. There would also be a detrimental impact on wildlife dependent on the woodland. See the government website <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

## Transport/Infrastructure

- Lodge Lane, all along the site, is narrow and winding with limited passing space especially under the railway bridge. Traffic from new housing on the site would cause unacceptable congestion.
- The traffic congestion would also affect Church Grove, which is narrow and busy at peak times with no passing possible in the section from the junction with Amersham Way to the A404. This point must be registered with those making any transport judgments on the Lodge Lane site.
- This site is too far from shops, healthcare and other facilities for most residents to walk, and there are no pavements on Lodge Lane between the site and the village. Cars would therefore be used exacerbating parking problems and traffic congestion in the village.
- Little Chalfont lacks the infrastructure (schools, healthcare, parking) to absorb any more large developments.

## Sustainability

- Refer to section 3.24.4 of the Sustainability Appraisal: Much but not all is within 1 km of Chalfont & Latimer station, even "as the crow flies";
- There is only one bus stop that may be within 200m of part of the site "as the crow flies", and the service provides once an hour service to Watford or High Wycombe (Mon- Sat, 7am to 7pm);
- The development is likely to increase the chronic road congestion on the A404 so may well increase the district's contribution to climate change.
- Refer to section 3.24.8: The nearest accident and emergency hospitals are either about 13 miles (Hillingdon) or 17 miles (Stoke Mandeville) from the site. Mount Vernon Hospital, which offers a minor injuries service, is about 8 miles from the site.
- The sporting facilities are at Westwood Park, not "Little Chalfont Park"

## **Points noted from the site evidence in the Sustainability Appraisal document, Section 3.24**

- The Buckinghamshire Landscape Character Assessment (2011) states that the strength of character and intactness of the character area is moderate.
- Development will lead to loss of Green Belt. It will encroach on those features identified in the character assessment, such as open farmland and woodland cover.
- Desktop data shows the following habitats present: woodland, some of which is ancient semi-natural, mature hedgerows, amenity grassland and rough grassland and scrub. Development is likely to result in loss

of habitats of particular importance, including ancient semi-natural woodland. Loss of habitats may also result in a loss of species of principal importance associated with them (Sustainability Appraisal Objective 3: Biodiversity: *Loss of ancient semi-natural woodland and ancient replanted woodland represents a permanent loss and cannot be mitigated or re-created.*)

- There is a public footpath located across the site.
- It is not possible to tell whether this site forms part of the strategic Green Infrastructure network
- Site contains Grade 3 agricultural land. It is unknown whether this is Grade 3a (considered the best and most versatile) or Grade 3b land (which is not). As such it is uncertain whether development would lead to loss of best and most versatile land (Sustainability Appraisal Objective 6: Natural Resources)

### **Some general points relevant to above from Sustainability Appraisal Scoping Document by Lepus Consulting**

5.1.1 The objectives of policies and plans at all levels, focus on the conservation of biological diversity (including a reduction in the current rate of biodiversity loss), and the protection and monitoring of endangered and vulnerable species and habitats. In general, emphasis is also placed on the ecological importance of brownfield sites, geodiversity, enhancing areas of woodland and other important habitats. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated.

5.1.4 The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more **resilient to current and future**.

5.2.18 It will be a key objective of the Plan to ensure that no development will directly impact upon the designated and protected sites, however there may be indirect impacts. The Chilterns AONB Management Plan (2008-2013) identifies a number of policies and actions to manage sites through habitat mapping. The Management Plan also recognizes the need to develop consistent approaches to understand the biodiversity resource at county level, across the district boundaries.



## ANNEX C

### BUILT AREA EXTENSION OPTION BETWEEN MAPLEFIELD LANE AND SNELLS LANE

Not mentioned in the HELAA. Part of the north-eastern projection of Green Belt Assessment (GBA) general area 27. This site, to be tested for housing use, is alongside another site to the west which is to be tested for employment use (See Annex D). The site is Green Belt and adjacent to the AONB from which it is visible.

We oppose release from the Green Belt and any development on this site. There are no exceptional circumstances to justify release.

#### Evidence

- HELAA history: none.

#### NPPF Green Belt Purposes

- GBA scores for general area 27 are high (Purpose 1 – 3+/5, Purpose 2 - 5/5, Purpose 3 – 3/5, Purpose 4 – 0/5.
- Para 4.3.4 (page 44) of the Bucks Green Belt Assessment - Methodology paper states *A rule of thumb was applied, whereby any General Area scoring strongly against the criteria for one or more NPPF purpose was judged to be meeting the purposes strongly overall and therefore deemed unsuitable for further consideration in Part 2 of the Green Belt Assessment.* This general area scored 5/5 for Purpose 2, so under the 'rule of thumb' the site is unsuitable for further consideration and should be removed from the map of options for testing in Appendix 2 of the Issues and Options Document. No justification has been given for its inclusion and none is evident.
- The GBA shows that this site meets the first three green belt purposes in the NPPF well, being an important barrier to sprawl and forming part of an 'essential gap' between the non-Green Belt settlements of Amersham and Little Chalfont. Overall the presence of built form (less than 10%) means the overall land parcel constituting area 27 has a largely rural, open character.

#### Transport/Infrastructure

- There is no satisfactory road access to the site.
- The site is too far from shops, healthcare and other facilities for most residents to walk. Cars would therefore be used exacerbating parking problems and traffic congestion in the village.
- Little Chalfont lacks the infrastructure (schools, healthcare, parking) to absorb any more large developments.

#### Environment

- Like other undeveloped areas near Little Chalfont this site is important as water drainage land feeding the chalk streams which are already impacted by extraction of water from the Chilterns. The river Misbourne already suffers from dryness in places. Further urbanisation in the area will worsen this problem.

#### Availability

- At present we are aware of no evidence that landowners are willing to release the site for development.
- We do not understand why this site has been brought forward for testing. It was not included by those preparing the HELAA.

#### Sustainability

- Refer to section 3.25.4 of the Sustainability Appraisal: The site is within 1 km of Chalfont & Latimer station "as the crow flies", but its inaccessibility indicates that the distance will be greater by a proper Barton measurement foot or car;

- There are bus stops that may be within 200m of part of the site "as the crow flies", but they provide only a once an hour service to Watford or High Wycombe (Mon- Sat, 7am to 7pm) or a once every 2 hours service to Amersham and Chesham [not Little Chalfont, as recorded] (Mon-Fri, 8am - 4pm);
- Refer to section 3.25.8: Services are limited at Amersham General Hospital, the only hospital possibly just within 5 km of the site "as the crow flies". The nearest accident and emergency hospitals are either about 13 miles (Hillingdon) or 17 miles (Stoke Mandeville) from the site. Mount Vernon Hospital, which offers a minor injuries service, is about 8 miles from the site.
- The sporting facilities are at Westwood Park, not "Little Chalfont Park".

### Points noted from the site evidence in the Sustainability Appraisal document, section 3.25

- There are 2 Grade II listed buildings on the site: Hances Cottage and the Hances Cottage/Beel House Walled Garden. Development may impact their setting. There are also two Grade II listed buildings on the edge of the site: Beel House and Snells Farmhouse. These will not be directly affected by development but their setting is likely to change from largely rural to edge of urban.
- Development would lead to loss of Green Belt and encroach on those features identified in the LCA (Buckinghamshire Landscape Character Assessment (2011) Hyde Heath Settled Plateau, Character Area no. 16.4) such as hedgerows and undeveloped green space in between development in particular. The LCA states that the strength of character and intactness of the character area is moderate.
- Main habitats present include amenity grassland (mainly gardens) and mature hedgerows. Mature hedgerows create habitat connectivity throughout the site. No biodiversity designation is associated with this site. Development at this site is likely to result in a loss in habitat connectivity and habitats of principal importance. Any species of principal importance associated with the habitats may also be lost (Sustainability Appraisal Objective 3: Biodiversity).
- There is a public footpath across the site.
- The site contains Grade 3 agricultural land. The Sustainability Appraisal says (3.25.6) it is unknown whether this land is Grade 3a (which is considered the best and most versatile) or Grade 3b land (which is not). As such it is uncertain whether development would lead to loss of best and most versatile agricultural land (Sustainability Appraisal Objective 6: Natural Resources).
- There are no areas of public greenspace within 600m of this site, thus access to recreation is considered to be limited (Sustainability Appraisal Objective 11)

### Some general points relevant to above from Sustainability Appraisal Scoping Document by Lepus Consulting

5.1.1 The objectives of policies and plans at all levels, focus on the conservation of biological diversity (including a reduction in the current rate of biodiversity loss), and the protection and monitoring of endangered and vulnerable species and habitats. In general, emphasis is also placed on the ecological importance of brownfield sites, geodiversity, enhancing areas of woodland and other important habitats. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated.

5.1.4 The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more **resilient to current and future.**

5.2.18 It will be a key objective of the Plan to ensure that no development will directly impact upon the designated and protected sites, however there may be indirect impacts. The Chilterns AONB Management Plan (2008-2013) identifies a number of policies and actions to manage sites through habitat mapping. The Management Plan also recognizes the need to develop consistent approaches to understand the biodiversity resource at county level, across the district boundaries

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## ANNEX D

### EMPLOYMENT AREA OF SEARCH EAST OF FINCH LANE

Not mentioned in the HELAA. Part of the north-eastern projection of Green Belt Assessment (GBA) general area 27. This site, which is to be tested for employment use, is alongside another site to the east which is to be tested for housing use (See Annex C). The site appears to include the present Beel House and grounds. The site is Green Belt and adjacent to the AONB from which it is visible.

We oppose release from the Green Belt and any development on this site. There are no exceptional circumstances to justify release.

#### Evidence

- HELAA history: none.
- GBA scores for general area 27 are high (Purpose 1 – 3+/5, Purpose 2 5/5, Purpose 3 – 3/5, Purpose 4 – 0/5)

#### NPPF Green belt Purposes

- The GBA shows that this site meets the first three green belt purposes in the NPPF very well, being an important barrier to sprawl and forming part of an 'essential gap' between the non-Green Belt settlements of Amersham and Little Chalfont. Overall the presence of built form (less than 10%) means the overall land parcel constituting area 27 has a largely rural, open character.
- Para 4.3.4 (page 44) of the Bucks Green Belt Assessment - Methodology paper states *A rule of thumb was applied, whereby any General Area scoring strongly against the criteria for one or more NPPF purpose was judged to be meeting the purposes strongly overall and therefore deemed unsuitable for further consideration in Part 2 of the Green Belt Assessment.* This general area scored 5/5 for Purpose 2, so under the 'rule of thumb' the site is unsuitable for further consideration and should be removed from the map of options for testing in Appendix 5 of the Issues and Options Document. No justification has been given for its inclusion and none is evident.

#### Environment

- Like other undeveloped areas near Little Chalfont this site is important as water drainage land feeding the chalk streams which are already impacted by extraction of water from the Chilterns. The river Misbourne already suffers from dryness in places. Further urbanisation in the area will worsen this problem.

#### Availability

- There is no justification given for this site being brought forward for testing. It was not included by those preparing the HELAA.

#### Sustainability

- Refer to section 4.8.4 of the Sustainability Appraisal: The site is within 1 km of Chalfont & Latimer station "as the crow flies", but its inaccessibility indicates that the distance will be greater by foot or car;
- The reference to the site being within 1 km of Amersham station is incorrect;
- There are bus stops that may be within 400m of part of the site "as the crow flies", but they provide only a once an hour service to Watford or High Wycombe (Mon- Sat, 7am to 7pm) or a once every 2 hours service to Amersham and Chesham [not Little Chalfont, as recorded] (Mon-Fri, 8am - 4pm);
- The development is likely to increase the chronic road congestion on the A404 so may well increase the district's contribution to climate change.

#### Points noted from the site evidence in the Sustainability Appraisal document, Section 4.8

- Several listed buildings adjacent, including Barkers and Maple Cottage and Faircot (both Grade II listed). Development may affect the setting of these features (Sustainability Appraisal Objective 1: Cultural Heritage: *It is assumed that all historic statutory designations, including listed buildings, will not be lost to development.*)
- The Buckinghamshire Landscape Character Assessment (2011) for 16.4 Hyde Heath Settled Plateau states that the strength of character and intactness of the character area is moderate.
- Northern area of site contains St Aidan's Catholic Church
- Development will lead to loss of Green Belt. It will encroach on those features identified in the Character Assessment such as the occasional woodland areas and the undeveloped green space in between development in particular that provide and maintain the remaining areas of tranquillity.
- Habitats present include broadleaved and mixed woodland, amenity grassland, mature hedgerows and ponds.
- Habitat connectivity across the site is generally good, with mature hedgerows and woodland creating a network across the site. Development is likely to result in loss of habitats of principal importance, so any species of principal importance associated with this will also be lost.
- Total development of the site is likely to result in a reduction of habitat connectivity (Sustainability Appraisal Objective 3: Biodiversity).
- The site consists of Grade 3 agricultural land. It is unknown whether this land is Grade 3a (which is considered the best and most versatile) or Grade 3b land (which is not). As such it is uncertain whether development would lead to loss of best and most versatile agricultural land (Sustainability Appraisal Objective 6: Natural Resources).
- Site is within Groundwater SPZ 2. Depending on the employment uses there is potential that development could reduce the quality of this water source (Sustainability Appraisal Objective 7).

#### Some general points relevant to above from Sustainability Appraisal Scoping Document by Lepus Consulting

5.1.1 The objectives of policies and plans at all levels, focus on the conservation of biological diversity (including a reduction in the current rate of biodiversity loss), and the protection and monitoring of endangered and vulnerable species and habitats. In general, emphasis is also placed on the ecological importance of brownfield sites, geodiversity, enhancing areas of woodland and other important habitats. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated.

5.1.4 The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future.

5.2.18 It will be a key objective of the Plan to ensure that no development will directly impact upon the designated and protected sites, however there may be indirect impacts. The Chilterns AONB Management Plan (2008-2013) identifies a number of policies and actions to manage sites through habitat mapping. The Management Plan also recognizes the need to develop consistent approaches to understand the biodiversity resource at county level, across the district boundaries.

## ANNEX E

**EMPLOYMENT AREA OF SEARCH ON LAND NORTH AND SOUTH OF A404, BORDERING ON STONY LANE AND CHURCH GROVE. Green Belt Assessment (GBA) General Areas 14b and 28. Identified in Appendix 5 of the Consultation Document as an 'Area of Search for Strategic Employment Options'. The site is both Green Belt and AONB.**

**We oppose release from the Green Belt and any development on this site. There are no exceptional circumstances to justify release.**

### Evidence

- HELAA history. It is not clear whether this site is connected with site CD0198, Lodge Farm, Lodge Lane in Appendix 8 (Draft supply of Employment Floorspace (including Mixed Use Sites). Otherwise there is no reference to it in the HELAA.

### NPPF Green Belt Purposes

- GBA scores for general areas 14b and 28 serving Green Belt purposes are high and neither part of the site is recommended for further consideration. There is no justification given for the selection of this site for testing in Appendix 5 of the Issues and Options document. Green Belt and AONB considerations have been ignored in making this selection.
- With regard to General Area 28 in particular, Para 4.3.4 (page 44) of the Bucks Green Belt Assessment - Methodology paper states *A rule of thumb was applied, whereby any General Area scoring strongly against the criteria for one or more NPPF purpose was judged to be meeting the purposes strongly overall and therefore deemed unsuitable for further consideration in Part 2 of the Green Belt Assessment.* This general area scored 5/5 for Purpose 2, so under the 'rule of thumb' the site is unsuitable for further consideration and should be removed from the map of options for testing in Appendix 5 of the Issues and Options Document. No justification has been given for its inclusion and none is evident.
- One side of the site is along the edge of the Little Chalfont built-up area (Church Grove, Stony Lane). The distinction along this line is sharp and clear, with no built form or other encroachment on the green belt side except the A404 which bisects the site in the form of a rural main road, without buildings alongside. The site therefore meets very well NPPF Purposes 1 and 3.
- The northern half of the site helps to form an important barrier between Little Chalfont and Chenies, meeting NPPF Purpose 2.

### AONB

- Meeting the Green Belt purposes should alone justify protection of the site. But we also note that the whole site is in the AONB. The National Parks and Access to the Countryside Act of 1949 defined the purpose of the AONB as 'to conserve and enhance the natural beauty', which in our view is not consistent with large development of built form. The Countryside and Rights of Way Act of 2000 placed a duty on public bodies to 'have regard to the purpose of the AONB'.
- The site is surrounded on three sides by pristine countryside, all of it in the AONB. The view of the site from those areas enhances the enjoyment of the AONB within them, which would therefore be reduced by development of the site.

### Recreation/Amenity

- Parallel with the northern boundary of the site, a few yards outside, there is a beautiful right of way which is one of the most used recreational routes in the area. The view from this path would be damaged by development of the site.

## Environment

- Like other undeveloped areas near Little Chalfont this site is important as water drainage land feeding the chalk streams which are already impacted by extraction of water from the Chilterns. The river Misbourne already suffers from dryness in places. Further urbanisation in the area will worsen this problem.
- Employment development on this site would eradicate the strong rural aspect of this side of Little Chalfont.
- The land sits astride the top of the ridge and any development would be in view of the Chenies and Latimer Conservation Area, especially from the Chess Valley walk on the other side of the valley.
- Chenies Village was the centre of the Bedford Estate with its Grade 1 Listed Manor House. To the West the Estate boundaries extended to Stony Lane and Lodge Lane either side of the A404 and this same land is still farmed by Chenies Manor today. Altering the boundaries would be a most unfortunate change historically speaking.

## Sustainability

- Refer to section 4.7.4 of the Sustainability Appraisal: The site is within 1 km of Chalfont & Latimer station "as the crow flies", but its inaccessibility indicates that the distance will be greater by foot or car;
- The site is not within 1 km of Amersham station;
- There is one bus stop that may be within 400m of part of the site "as the crow flies", and the service provides only once an hour service to Watford or High Wycombe (Mon- Sat, 7am to 7pm);
- The development is likely to increase the chronic road congestion on the A404 so may well increase the district's contribution to climate change.

### **Points noted from the site evidence in the Sustainability Appraisal document, Section 4.7**

- Site is in AONB and development is likely to change its character from greenfield to a more urban or industrial feel. Site is arable land, woodland and hedgerows. The Buckinghamshire Landscape Character Assessment description (for 18.3 Little Chalfont Rolling Farmland) states that the strength of character and intactness of the character area is moderate. The southern area contains part of Old Hanging Wood. A public bridleway crosses through the site.
- Development will lead to loss of Green Belt. It will encroach on those features identified in the Character Assessment such as the open farmland and woodland cover and the rural farmed and wooded character of the landscape in particular, that provide and maintain the remaining areas of tranquillity.
- A review of desktop data shows arable fields with mature hedgerows make up the majority of the site. Ancient replanted woodland is present along the south of the site.
- The site is in Colne Valley Biodiversity Opportunity Area. Development may result in loss of mature hedgerows. Any species of particular importance associated with habitats of particular importance, such as mature hedgerows, is likely to be lost. The ancient replanted woodland and Local Wildlife Site should be taken into consideration (Sustainability Appraisal Objective 3: Biodiversity).
- The site also consists of Grade 3 and 4 agricultural land. It is unknown whether this is Grade 3a (which is considered the best and most versatile) or Grade 3b land (which is not). As such it is uncertain whether development would lead to loss of best and most versatile agricultural land (Sustainability Appraisal Objective 6: Natural Resources).
- Site is within Groundwater SPZ 2. Depending on the employment uses there is potential that development could reduce the quality of this water source (Sustainability Appraisal Objective 7).

### **Some general points relevant to above from Sustainability Appraisal Scoping Document by Lepus Consulting**

5.1.1 The objectives of policies and plans at all levels, focus on the conservation of biological diversity (including a reduction in the current rate of biodiversity loss), and the protection and monitoring of endangered and vulnerable species and habitats. In general, emphasis is also placed on the ecological importance of brownfield

sites, geodiversity, enhancing areas of woodland and other important habitats. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated.

5.1.4 The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future.

2.16 The Chilterns AONB is a landscape designation with strong associations with biodiversity.

5.2.18 It will be a key objective of the Plan to ensure that no development will directly impact upon the designated and protected sites, however there may be indirect impacts. The Chilterns AONB Management Plan (2008-2013) identifies a number of policies and actions to manage sites through habitat mapping. The Management Plan also recognizes the need to develop consistent approaches to understand the biodiversity resource at county level, across the district boundaries

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Ref	Title	Published by	Date	http Link
1	Chiltern and South Bucks Local Plan Initial Consultation (Regulation 18) Incorporating Issues and Options	CDC and SBDC	Jan / Mar 2016	<a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7771&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7771&amp;p=0</a>
2	Core Strategy for Chiltern District	CDC	Nov 2011	<a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=1199&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=1199&amp;p=0</a>
3	Green Belt, Briefing Paper	House of Commons Library	No. 00934 30 June 2015	<a href="http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN00934#fullreport">http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN00934#fullreport</a>
4	Buckinghamshire Housing and Economic Development Needs Assessment 2015 Report of Findings	Buckinghamshire County Council	Consultation Draft: January 2016	<a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7767&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7767&amp;p=0</a>
5	Housing and Economic Land Availability Assessment	CDC and SBDC	Jan 2016	<a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7750&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7750&amp;p=0</a>
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7	Buckinghamshire Green Belt Assessment Part 1A: Methodology	Arup	Aug 2015	<a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7461&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7461&amp;p=0</a>
8	RTPI London's Strategic Planning and Green Belt event Podcasts	RTPI	11 Feb 2016	<a href="http://www.rtpi.org.uk/briefing-room/podcasts/general-playlist/2016/february/rtpi-londons-strategic-planning-and-green-belt-event-(part-1)/">http://www.rtpi.org.uk/briefing-room/podcasts/general-playlist/2016/february/rtpi-londons-strategic-planning-and-green-belt-event-(part-1)/</a>
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10	The Chiltern Area of Outstanding Natural Beauty Management Plan 2014-2019	The Chilterns Conservation Board		<a href="http://www.chilternsaonb.org/uploads/files/ConservationBoard/ManagementPlan/Management%20Plan%202014-19/chilterns_management_plan_2014-19_final.pdf">http://www.chilternsaonb.org/uploads/files/ConservationBoard/ManagementPlan/Management%20Plan%202014-19/chilterns_management_plan_2014-19_final.pdf</a>
11	Chiltern and South Bucks Settlement and Infrastructure Capacity Study Report of Settlement Findings – Baseline Assessment	CDC and SBDC		<a href="http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7749&amp;p=0">http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7749&amp;p=0</a>
12	Sustainability Appraisal of the Chiltern and South Bucks Local Plan SA Scoping Document	LEPUS Consulting	Nov 2015	<a href="http://www.southbucks.gov.uk/CHttpHandler.ashx?id=7688&amp;p=0">http://www.southbucks.gov.uk/CHttpHandler.ashx?id=7688&amp;p=0</a>
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