

**Chiltern and South Bucks Local Plan**  
**Green Belt Preferred Options Consultation Response**  
**by**  
**Deer Park Walk Management Ltd**  
**December 2016**



## **PART A – Respondent Information:**

This statement is submitted on behalf of **Deer Park Walk Management Limited** who manage the common areas and general estate represented by the 14 homes in Deer Park Walk at Lye Green, near Chesham, Bucks.

This submission made by Mr Phillip Plato in his capacity as Chairman of Deer Park Walk Management Ltd. He is authorised by the Board of Deer Park Walk Management to make this submission following a Resolution approved at the company's General Meeting on 9 December 2016.

Mr Plato is also a Chartered Planning & Development Surveyor and Member of the Royal Institution of Chartered Surveyors. He has lived in Deer Park Walk for 17 years and his business is based in Chesham.

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## **PART B Response:**

The Directors of this company OBJECT to the proposed release of Green Belt land for housing development referred to as **Preferred Site Option No. 1** Land to the North East of Chesham listed within the Green Belt Preferred Options Consultation October – December 2016.

This OBJECTION is fundamentally derived from two broad areas of concern.

Namely:

- 1.** The lack of “exceptional circumstances” to justify modification of Green Belt boundaries combined with the potential consequence from this loss of Green Belt including injurious effects on openness and neighbouring communities and our concerns regarding the process by which this particular site appears to have been selected as a preferred option and
- 2.** The effect on the town as a whole as a consequence of the proposed development upon the subject site which we contend is unsustainable in planning terms.

Accordingly, this submission will explain our concerns under both of the aforementioned headings.

With regard to our concerns about the sites proposed removal from Green Belt status, our comments will follow under several sub headings.

Namely:

- Methodology of site selection
- Inconsistency with National Planning Guidance
- Flaws in what is a subjective Appraisal of this Green Belt site options and
- Potential Harm that will be caused by removing this site from the Green Belt.

This submission follows on our previous comments on the Initial Consultation in early 2016.

## 1.1 METHODOLOGY:

- 1.1.1 We are concerned that the method adopted to select this site as one of the preferred options is flawed and inconsistent.
- 1.1.2 We are concerned that there appears to have been a significant change in the approach by the local authority in the last few years resulting in this site being put forward as a preferred option. After the Chiltern District Core Strategy was adopted in 2011 the Council undertook a Delivery Development Plan Document (DDPD) in June 2013 involving a study of potential minor Green Belt alterations to consider perceived anomalies and minor Green Belt alterations and to test each of these on a case by case basis to see if exceptional circumstances existed at that time to merit a change to the Green Belt boundary.
- 1.1.3 A total of 35 sites were considered just 3 years ago as part of that study, which included Nashleigh Hill and Lycrome Road that both border the subject site (Preferred Option No 1) with the outcome being that there were no exceptional circumstances identified in 2013 to merit any Green Belt alterations. It seems inconsistent that just 3 years later that a combined emerging Local Plan should now be seeking to revise the Green Belt boundary around Chesham to the extent that it is proposed that this Preferred Site Option No 1 in Chesham alone will accommodate nearly 16% of the unmet housing needs for both Districts with potential injurious effects on the town.
- 1.1.4 Obviously, any emerging Local Plan requires a further assessment of the Green Belt but neither the NPPF, nor the supporting national PPG, provides guidance on how to conduct such a Green Belt Assessment. The implied emphasis is on each authority to develop a methodology which is appropriate to the local context.
- 1.1.5 Qualitative approaches are primarily used by most local authorities in such assessments; although some authorities have used more quantitative measures too. The approach to scoring, when conducting such Green Belt assessments, varies from simplistic traffic light systems to more complex approaches of scoring. However, a systematic assessment is vital to reach decisions which are sound and justified. However, in this case, the preliminary Green Belt assessment has attempted to start a systematic appraisal but this has not been followed through particularly with the Part 2 Assessments & the Green Belt Development Options Appraisals where sites have been moved forward with less quantitative or qualitative methodology and more on vague and subjective opinions.
- 1.1.6 It is clear from the Evidence Base that many hundreds of sites across both Districts have been considered. The process commenced with a Part 1 Assessment of Green Belt in Buckinghamshire undertaken by ARUP in March 2016. The methodology adopted by ARUP was to consider strategic land parcels (General Areas) and to assess them using both qualitative and quantitative measures. Each site was scored against the various key purposes of Green Belt designation. Curiously, this approach appears to have been abandoned in the Part 2 Assessment dated October 2016.
- 1.1.7 The subject site in the Part 1 ARUP Report was referred to then as Number 13a and was assessed to have passed the criteria for being at a strategic location able to prevent sprawl of the built up areas. This is the fundamental aim of Green Belt as stated in the NPPF and thereby justifies, in part, it remaining within Green Belt designation.

- 1.1.8 It is unclear therefore why the subject site (13a) was then recommended in Part 1 as one of 36 sites for further consideration when there seems to be inconsistency in scoring against the other four Purposes of Green Belt compared to all the other sites that were assessed in that the report. However, at least within Part 1 there was an attempt to assess all the sites using an objective scored methodology even if it appears to have been inconsistent.
- 1.1.9 Crucially, Part 1 of the ARUP Report in the Evidence Base then suggests that whilst this site may be considered as an option, the local authority now needed to consider if “*exceptional circumstances*” exist to justify its removal from Green Belt.
- 1.1.10 ARUP went on in its conclusion in Part 1 regarding the subject site to emphasise that “*It should also be noted that, at the local level, the parcel plays a role in protecting the gap between Chesham and Lye Green, identified as a Row of Dwellings in the Chiltern Local Plan, preventing their coalescence*”. The National Planning Policy Framework (NPPF) states that: “*the fundamental aim of Green Belt Policy is to prevent urban sprawl*” and as such this was a significant statement that not all of the other 35 sites identified in Part 1 could claim.
- 1.1.11 The local authority has since moved on to conduct Part 2 of their Green Belt Assessment, this time undertaking the work themselves and a draft Part 2 Assessment is in the Evidence Base dated October 2016.
- 1.1.12 The NPPF requires any planning authority to consider sustainability when preparing its Local Plan and aside from how well a site is performing against Green Belt criteria, the sustainability of a location should also form part of any assessment of whether exceptional circumstances exist for further consideration for removing Green Belt designation.
- 1.1.13 Unlike Part 1, no further qualitative and quantitative assessment was undertaken in the Part 2 Assessment of the 36 remaining Green Belt sites carried forward. The methodology adopted has been openly criticised by Critical Friends (represented by Aylesbury Vale DC) in Appendix 1 of the draft Part 2 Assessment including the fact that objectively assessed housing need alone does not justify “exceptional circumstances” to modify a Green Belt boundary.
- 1.1.14 However, even though Part 2 is only in draft, and despite the criticisms regarding its approach and methodology, this appears not to have stopped the local authority from also publishing a Green Belt Development Options Appraisal dated October 2016 that in turn uses most imprecise and subjective terminology to appraise the subject site and to then move it onto Preferred Site status from the 35 other sites shortlisted in the Part 1 Assessment.
- 1.1.15 In particular, the Part 2 Report states that “*the approach to exceptional circumstances adopted in the Green Belt Assessment Part Two for Chiltern and South Bucks Districts is designed to reflect the duty to achieve sustainable development*”, however no substantive justification is apparent for referring to the Preferred Option Site No.1 as “*sustainable*” in the Green Belt Development Options Appraisal.
- 1.1.16 This appears to have been a muddled and inconsistent process and supports our assertion that the methodology of selecting sites for the Preferred Options is flawed and cannot be justified.

## 1.2 INCONSISTENCY WITH NATIONAL GUIDANCE

1.2.1 The National Planning Policy Framework (NPPF) states that Green Belt Boundaries should only be changed in “*exceptional circumstances*”. We contend that the Local Authorities have not demonstrated that there are exceptional circumstances for this site involving 57.26ha of land to be removed from the Green Belt.

1.2.2 We believe that the only possible justification for exceptional circumstances for this site to be removed from Green Belt would be for the Local Authority to demonstrate that this site, when compared to all the other Green Belt sites that have been appraised;

- is failing to fulfil the fundamental purposes of Green Belt policy and
- that the location is sustainable for development.

We submit that the Planning Authority has failed on both counts in respect of this site.

1.2.3 The NPPF states that: “*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.*” The subject site sits to the northeast of Chesham and for decades has successfully prevented Chesham sprawling to the north and coalescing with the neighbouring settlements and hamlets of Lye Green, Botley, Orchard Leigh and Whelpley Hill. This fact was expressly highlighted in the earlier ARUP Part 1 Assessment. If this site is to be removed from Green Belt designation, the community of Lye Green will be consumed by Greater Chesham and will lose its individual identity.

1.2.4 We contend that the Preferred Option Site no. 1 does make a significant contribution to the openness of the area that has been a key feature of the locality and which has for many years has also successfully prevented adverse visual impact on the nearby Chilterns Area of Outstanding National Beauty and neighbouring Green Belt sites. Accordingly, we feel that the subject site makes a positive contribution towards the fundamental aims of Green Belt Policy as stated in the NPPF.

1.2.5 The Preferred Option Site No. 1 also performs well against the 5 stated purposes within the NPPF for land to be included within Green Belt. Namely:

- To check the unrestricted sprawl of large built up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safe guarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

1.2.6 We contend that the subject site satisfies all of the first three listed purposes. Although Chesham is not an historic town, it does have its own unique history and heritage and the subject site has provided a distinct boundary to the north that has contributed to maintaining the town’s identity whilst also preventing ancient woodland and historic areas such as Brockhurst Farm (grade II listed) from becoming lost in a sprawling town. It has also successfully assisted in the 5<sup>th</sup> purpose and would continue to do so were it not for the council now proposing the build on it!

1.2.7 Accordingly, we contend that the site makes a positive contribution to the Green Belt and adequately satisfies the criteria for being included and retained within it.

- 1.2.8 Conversely, no evidence has been presented to demonstrate that there are “*exceptional circumstances*” for this site being removed from Green Belt designation which the NPPF states is the only justification for redrawing Green Belt boundaries. Housing need alone is not enough. Indeed, the housing need for Chesham remains unquantified until the supply of all land including brownfield and other land in the areas is adequately assessed.
- 1.2.9 The case of *Gallagher Homes v Solihull Metropolitan Borough Council [2014] EWHC 1283* deals with the test for redefining a green belt boundary since the publication of the NPPF. It was held that it is not arguable that the mere process of preparing a new local plan could by itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary.
- 1.2.10 What is clear from the principles distilled in the case of Gallagher is that for revisions to the green belt to be made exceptional circumstances have to be demonstrated.
- 1.2.11 The Local Planning Authority have not demonstrated the existence of “exceptional circumstances” and as such, the proposal to remove the subject site from Green Belt designation is unjustified.
- 1.2.12 The NPPF encourages Green Belt boundary reviews to be in accord with sustainable patterns of development (paragraph 84). In this respect, the local authority has also not demonstrated that the site is a sustainable location.
- 1.2.13 As such, its consideration as a Preferred Option is flawed and unjustified.

### **1.3 FLAWS IN GREEN BELT DEVELOPMENT OPTIONS APPRAISAL (Oct 2016):**

- 1.3.1 The Green Belt Development Option Appraisal document appears within the Evidence Base and is referred to in the Consultation Preferred Options Document.
- 1.3.2 The Green Belt Development Option Appraisal was published at the same time as the aforementioned Part 2 Assessment of Green Belt and it attempts to assess all of the 15 preferred Green Belt options for the emerging Local Plan. It is unclear how the 36 sites listed in Part 1 have now been refined to the 15 preferred options. However, for the purposes of this submission our comments on this Appraisal document are confined only to the subject site namely the Preferred Option Site No. 1 identified therein as Area Northeast of Chesham (Lye Green Road area).
- 1.3.3 The Green Belt Development Option Appraisal when describing the Preferred Option Site No. 1 is vague, makes sweeping generalisations, and we contend its conclusion is unjustified and is therefore fundamentally flawed for the following reasons:
- 1.3.4 The Appraisal assesses the subject site and its Green Belt location as “*sustainable*”. There is no justification for this statement in the Green Belt Development Options Appraisal or in the draft Part 2 Assessment from which it was derived.
- 1.3.5 We note there is a separate report in the Evidence Base entitled “*Sustainability Appraisal of the Chiltern and South Bucks Local Plan*” (dated January 2016) but as we will highlight later, there are factual mistakes within that report (notably in paragraph 3.11.4). Furthermore, paragraph 3.11.3 of the Sustainability Report highlights there will be harm caused to natural habitats & species contrary to SA

Objective 3, and that development of this site will adversely affect the setting of the nearby AONB (para 3.11.12) , and there will be loss of good quality agricultural land contrary to SA Objective 6 (para 3.11.6). Therefore based on this contradictory evidence, we fail to understand how the Green Belt Development Option Appraisal document can claim the subject site is “sustainable”.

- 1.3.6 Curiously, both the Preferred Options Consultation Document & the Green Belt Development Options Appraisal suggest that a community centre & convenience type shop should be incorporated into the development of 900 homes. This alone suggests the Council have concerns about the sustainability of this location. The implication is that the addition of such features will then make an unsustainable location, become sustainable. This again is muddled thinking.
- 1.3.7 The subject site is not in close proximity to places of employment nor is it close to suitable modes of public transport for people to get to work. The Preferred Options Consultation Document suggested “*infrastructure requirements are being considered*” but for the moment it can only point to the need for a potential expansion of Brushwood Junior School and provision of “*a Sustainable Urban Drainage System so that the site addresses its own drainage impacts to as far as possible lessen, or at the very least prevent exacerbation of flood risk in Chesham*”. We suggest this is a lamentable understatement of the issues.
- 1.3.8 No consideration appears to have been taken as to whether Brushwood school can be expanded either in terms of finance to undertake it or whether it has the land on which to expand.
- 1.3.9 Whilst it is gratifying to read that the Council acknowledge there is a drainage problem in the town and that a “*Sustainable Urban Drainage System*” is necessary at this location, we contend this is not as easy as it sounds. Indeed, the Consultation document itself suggests the best that can be hoped for is to mitigate the impacts on the town’s drainage. The suggestion is that the proposed new drainage for the homes should “*address its own drainage impacts*” and presumably the only way to do that is to construct a water treatment/drainage facility on any remaining land within the subject site on remaining areas that are not being allocated for housing. This would be extraordinarily expensive and will intensify the development of the subject site considerably and will likely compromise the viability of the development. It will also be problematic as the site and nearby roads already flood from surface water run-off.
- 1.3.10 Such additional development will also further impact on the openness of neighbouring Green Belt land. Whilst the proposal currently being considered is only for the principle of 900 homes at this Green Belt location, the implication is that considerable infrastructure works will also be necessary on the rest of the land as well.
- 1.3.11 We contend that just expanding a local school and installing a new drainage system is only the least of the infrastructure requirements.
- 1.3.12 Development on this scale, at this location will also impact on many roads and junctions in the town that cannot easily be widened or modified to improve vehicular capacity at junctions. The roads surrounding the site will also need improvements, especially Lycrome Road, which will not be easy or inexpensive given the road is so narrow, twisty and there are a number of homes built close to the edge of the highway.

- 1.3.13 The tube station is only providing two trains an hour and the single track line cannot easily be upgraded without cost. These costs are beyond the remit of a Local Planning Authority.
- 1.3.14 If buses are to be enhanced, where will they be located/based and how will the enhanced service to accommodate these extra homes be funded?
- 1.3.15 There will also be consequential increased demands placed on local doctor's surgeries and dental practices many of which are operating close to capacity and are located beyond reasonable walking distance of the subject site. This will result in increased demand for local car parking in the town as well.
- 1.3.16 Even assuming that the housing development is confined to the southern areas of the site fronting Lye Green Road, the majority of the 900 homes proposed there will still be in excess of 2 km from the town centre or from shops and particularly Chesham station.
- 1.3.17 On this point it should be noted that Sustainability Appraisal of the Chiltern and South Bucks Local Plan states that "*Chesham station is located within 1km of the site*". This is incorrect. Indeed, for proof of this error, the same report refers to the nearby Leisure Centre as being 1.5km from the site yet the Leisure Centre is actually located between the site & the railway station. We have measured the distance between the site and the station as 1.8km. Given that only half the site is proposed for development and it is not stated which areas specifically will be built upon, it is only possible to measure from the extreme southern edge of the site. Even then, using ProMap OS and measuring along the roads & footpaths to the station, (rather than a straight line) the closest distance from the site to the station is 1.8km and so those living within the proposed development will have over 2km to walk and will have even further to go to reach the shops, Town Hall or Lowndes Park.
- 1.3.18 In contrast, acknowledged acceptable walking distance for persons without physical impairment is tabulated below:

Definition	Walking Distances (metres)		
	Town Centres	Commuting / Schools	Elsewhere
Desirable	200	500	400
Acceptable	400	1000	800
Preferred Maximum	800	2000	1200
Source: Providing for Journeys on Foot, IHT, 2000			

It can be seen that the subject site is located in excess of all the preferred maximum distances.

- 1.3.19 Even assuming occupants were willing to walk such an excessive distance to get to such facilities, they will have to negotiate a steep hill (White Hill) to do so. This topography will not encourage cycling other than for the most fit or youthful and will also render any cycleway impractical too.
- 1.3.20 These factors will encourage vehicle use from the proposed development. It is difficult to understand how a site that would appear to demand regular vehicular access could be considered sustainable. The addition of a local shop will not resolve this and the shop itself will require delivery Lorries to service it.
- 1.3.21 The NPPF in Chapter 4 "Promoting Sustainable Transport" states that "*Encouragement should be given to solutions which support the reduction in greenhouse gas emissions and reduce congestion. In preparing*

*Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport*". In the face of this, the subject site appears to be in conflict with national guidance.

- 1.3.22 Curiously, the Green Belt Development Option Appraisal when making assessment of the Green Belt at this location, merely stated was that "*exceptional circumstances may apply*". The author is clearly unsure by use of the word "may" and no justification for this suggestion is offered. Given the aforementioned comments, any assertion about exceptional circumstances is unjustified.
- 1.3.23 A component of the subject site is also proposed for Gypsy and Traveller accommodation too. However, if it is unsustainable in development terms for the settled community then it will similarly be unsustainable for Gypsy and Traveller use too. As such the idea that the site should also accommodate Gypsies & Travellers within the Preferred Option Consultation Document is misguided. Other problems associated with locating a Gypsy & Traveller site at this location are recited later in this submission.
- 1.3.24 It is unclear from either the Green Belt Development Options Appraisal or the latest Preferred Options Consultation document whether the proposed 900 dwellings at the site include Gypsy & Traveller households as well as the suggested provision for specialist elderly accommodation. If it does not and these are additional requirements to the 900 homes currently being suggested, then all the earlier concerns herein are only made worse.
- 1.3.25 In contrast to the Green Belt Development Options Appraisal, we regard the subject site as being in an unsustainable location. It is too far from the town centre and the railway station. Infrastructure is poor, especially the roads serving it. As previously stated, the areas within the site being proposed for development are not identified specifically so the main access road is also impossible to identify. However, the road to the north (Lycrome Road) contains a number of hazards mainly related to some blind bends and a very narrow road width a number of private residencies close to the roads edge. Both Lycrome Road & Lye Green Road lead to busy road junctions accessing the town. As will be shown later, these junctions are already close to design capacity and there is little room for highways improvements at these or other busy junctions in the town.
- 1.3.26 Lye Green Road, although slightly wider, also provides access to two schools where there is inadequate parking and where parents frequently park on the road at times of drop off and pick up. It is also the main approach to other nearby settlements of Orchard Leigh, Whelpley Hill, Bovingdon and in part to Botley. The increase in traffic generated on this road from the subject site would injuriously affect these communities too.
- 1.3.27 The Green Belt Development Options Appraisal claims to offer an appraisal of sustainability and describes the impact on cultural heritage and landscape as only having "*a moderate adverse impact*". This and similar comments offered throughout the Green Belt Development Options Appraisal are too subjective, vague and imprecise. There is no objective scoring of all the various criteria that need to be considered to justify such statements either in that document or the related Part 2 Appraisal.
- 1.3.28 Similarly, a short comment was made that the proposed development would have a "*minor adverse impact*" in relation to biodiversity. No definition is offered of such a description and in the absence of any objective scoring used to reach such a subjective generalisation, (or any similar generalised statement therein) it is difficult to afford this document any weight.

- 1.3.29 Curiously, the Sustainability Appraisal of the Chiltern and South Bucks Local Plan produced earlier in January 2016 that is included in the Evidence Base clearly suggests in paragraph 3.11.3 that “*Development at this site is likely to result in a loss of habitats of principal importance.*” It is difficult to understand how one could conclude the effect on biodiversity would be a “minor adverse impact” in the face of this contradictory evidence. This further undermines any credibility of the Green Belt Development Options Appraisal.
- 1.3.30 However, the Green Belt Development Options Appraisal continues in a similar vein of generalised and unsubstantiated statements. It offers an appraisal of sustainability in terms of natural resources, health and waste as having a “*neutral impact*”. It is hard to share this conclusion as self-evidently a development of 900 homes will place significant demands on natural resources such as water consumption, and increased car usage created from the development will also add to pollution and degradation of air quality and 900 dwellings will inevitably produce additional waste as well. As such it is hard to share the view there will be a “*neutral impact*” which is unjustified.
- 1.3.31 Curiously, the sustainability appraisal goes on to suggest that development on the subject site could have a “*moderate positive impact*” on transport. No explanation of this extraordinary statement is offered. However, it goes on to suggest that the development could have an “*uncertain impact*” on pollution, the economy, climate change mitigation and adaptation. Again no further comment or explanation is offered. We suggest that there will be noticeable adverse impact upon pollution for the aforementioned reasons and any increase in traffic congestion would actually have an adverse impact upon the local economy.
- 1.3.32 Reference is made to the earlier initial Public Consultation undertaken between January and March 2016 where a larger site (including part of the subject site) was included as a development option to the northeast of Chesham. The Green Belt Development Options Appraisal offers a summary of the responses and states that most responses to that consultation “*related to the principle of development*” and that there were 181 objections at that time. We feel that the level of resistance and public objection to the earlier larger proposal in Jan- March was understated then largely due to the fact that many local people were unaware of that initial consultation exercise in early 2016.
- 1.3.33 We have since been made aware that an association of local residents has been formed. This is as a consequence of both the second Public Consultation currently under consideration into the Green Belt options and also as a consequence of general public outrage that not only was this area at Lye Green still being considered for removal from Green Belt protection, but that once again there had been very limited publicity about these proposals.
- 1.3.34 We have since been made aware that the Lye Green residents (which we support) has commissioned a petition hosted on a specialist online portal known as Petition24.com specifically to identify the general numbers of people who are opposed to development on the Green Belt at the Preferred Site Option No. 1. This has been supplemented by a physical paper petition set up for those who might not have internet access or who prefer to register their opinion in person. We are advised that at the time of writing this submission, within the first 18 days of inviting the public to sign some **1,455** people have put their name to this petition. Of these 996 have signed online & 459 people have signed in person. This is significantly higher than the initial consultation conducted by the Local Planning Authority earlier in 2016 and reflects growing hostility to the proposal as over time more people become aware of this unpopular initiative. We are advised the petition will be ongoing and therefore numbers will continue to grow over time.

- 1.3.35 We have been asked to attach a list of the various comments that have been made by people when signing this petition. Whilst a small minority of some comments are not material planning considerations, the majority raise serious & relevant issues and refer to concerns about loss of Green Belt, effect on openness, and impact on the wider community including demands on local infrastructure and traffic generation. Respondents were not required to comment when signing the petition but 91 people have voluntarily chosen to do so. It is vital the Local Planning Authority are aware of the scale of public opposition to the proposals at Preferred Option Site No.1. As such we have been asked to attach a copy of both the online and paper Petitions together the public comments recorded on line which is attached in Annex 1.
- 1.3.36 The Green Belt Development Options Appraisal goes on to consider other land use considerations. Curiously, it states “*no specific issues were identified*”. This is lamentably poor and one has to question why no issues were identified. Self-evidently the land is already used for agricultural purposes and its development will result in the loss of agricultural land, which we are led to believe is of high quality grade 3 land possibly grade 3a (the highest grade possible). That is an important material consideration for any proposed use of this site. Once lost to development it could never be recovered.
- 1.3.37 Even the most casual review of an OS map or even the briefest of visits to this site, will indicate that the area has a number of well-trodden public footpaths going across it. It is regularly seen to be used by groups undertaking their Duke of Edinburgh awards as well as groups of ramblers and dog walkers. Accordingly, we contend this area makes a significant contribution to informal outdoor recreation of the community at large and whilst public footpaths must always be respected by any development, the amenity and enjoyment derived from rambling and dog walking will be affected by any development around these pathways.
- 1.3.38 Furthermore, a number of areas with the Preferred Option Site No. 1 are woodland, some of it well established or possibly ancient woodland. These areas also offer opportunities for informal recreation and they support biodiversity which this report previously suggested would only suffer “*minor adverse impact*”. Given that the scale of this proposal may be considerably greater than 900 homes (ie: with additional sewage water treatment works, or specialist elderly accommodation, neighbourhood shop & community centre plus gypsy accommodation), we contend these natural features will also be compromised and threatened.
- 1.3.39 Within the Green Belt Development Options appraisal, it is suggested that traffic modelling shows “*significant increases in travel time within Chesham town centre and on roads to the eastern part of the town*”. Having reviewed the Evidence Base and in particular the County Council’s Highways reports (Countywide Local Plan Modelling Report by JACOBS July 2016 – see 5.2.3) we can only agree with this. The JACOBS Report asserts that there will be “*significant increases in travel time through the centre of Chesham*” with “*travel times on St. Mary’s Way increasing threefold*”. The JACOBS Report concludes by colour coding red and identifying Chesham as one of 7 areas out of the 23 reported on as suffering significant impact in terms of increased travel time from the development proposals.
- 1.3.40 It is noted that the Green Belt Development Options Appraisal identifies particular impact on the A416/Broad Street/White Hill roundabout, the A416 Broad Street to Park Road, White Hill, B4505/White Hill/Botley Road roundabout and the A416/Vale Road roundabout. Indeed, the JACOBS Highways report confirms that these junctions are already either at or exceeding their design capacity and the report suggests that congestion waiting times within the town could increase overall by as much as 400%.

- 1.3.41 This means that if it currently takes 10 minutes to drive through the town from one side to the other, it could take over 40 minutes if this development goes ahead. It is therefore astonishing how any appraisal of this site could be considered “*sustainable*” in the face of this evidence.
- 1.3.42 The findings in the JACOBS Report are supported by an independent traffic assessment that is not in the Evidence Base but which was undertaken for an unrelated development elsewhere in the town (LPA Ref CH/2016/1770/FA). This separate report has been undertaken by Caneparo Associates in September 2016 and their comments specifically regarding the A416/Broad Street/White Hill roundabout & Bellingdon Road/St Mary’s Way Junction and at A416 St Mary’s Way/Park Road/Blucher St junction corroborate the JACOBS modelling.
- 1.3.43 It should also be noted that the JACOBS traffic modelling Report excludes any predicted HS2 construction traffic estimate and so it is clear that the proposed development will result in significant congestion and traffic problems with potential to damage the town’s economy.
- 1.3.44 Whilst it is noted that a comment is included in the Green Belt Development Options Appraisal that the proposed site has the potential to help fund “*mitigation schemes*” (presumably a reference to S.106 contributions or Community Infrastructure Levy generated from any development of the site), such contributions cannot possibly fund them all, due to the scale & number of highway improvements necessary even if sufficient land were available to undertake such highway improvements anyway.
- 1.3.45 Obviously, funds are also required to mitigate other issues related to air quality, education, healthcare, drainage, sewerage treatment, parking and railway/station upgrade and even if all developer contributions could be pooled to address all these infrastructure issues, the viability of the development of 900 homes would then be highly questionable.
- 1.3.46 The Development Options Appraisal offers no suggestions as to what improvements will be made or how they will be implemented and we respectfully suggest that infrastructure improvements are needed before any development can be initiated or considered.
- 1.3.47 In terms of infrastructure, the Appraisal also identifies the risk of surface water flooding but makes the curious suggestion any development on this Preferred Option Site No1 should not allow surface water to drain downhill. Given that the site is at the top of a hill it is difficult to understand what other viable option there is. The Green Belt Development Options Appraisal confirms that “*it is difficult to improve drainage in this area*”. Given that the Environment Agency’s plans do not provide significant additional capacity, we suggest this is further evidence of this site’s unsuitability. The earlier comments about a “*Sustainable Urban Drainage System*” are more easily said than done and we strongly suspect that some substantial additional development on the remainder of the subject site is inevitable in addition to the 900 homes being proposed in light of the comments made in the Appraisal. We must question why is this not being highlighted in the Preferred Options Consultation?
- 1.3.48 In light of all the foregoing we cannot understand how the author of the Green Belt Development Options Appraisal could reach the conclusion that the subject site should be included as a preferred option for consultation therefore.

## 1.4 POTENTIAL HARM CAUSED BY LOSS OF GREEN BELT DESIGNATION

- 1.4.1 If the subject site is removed from the Green Belt, it is suggested in the Preferred Options Consultation that potentially around half the area will be developed for 900 homes. As previously explained, we are concerned additional sewage works or other infrastructure development is going to be proposed on the remaining areas of the site too. Even if we are wrong in this assumption then the remaining land will come under pressure for further development without Green Belt protection.
- 1.4.2 If the whole site is removed from Green Belt designation, then the “openness” of the area will be compromised and Lye Green will lose its individual identity. However the neighbouring areas of Botley, Orchard Leigh, Ashley Green and Whelpley Hill will also be threatened and will also suffer injurious effects most notably through increased traffic and congestion.
- 1.4.3 The loss of good quality agricultural land will itself be harmful as will the loss of land for outdoor informal recreation.
- 1.4.4 Removing the subject site from Green Belt designation and proposing housing on it means that all types of housing must then be considered. The Preferred Option Consultation document recognises this obligation (presumably under the Equalities Act and other legislation) and then seeks to consider whether other housing types should be included on the site too, notably affordable housing but also self-build, as well as specialist elderly accommodation and possibly a Gypsy Traveller site. This is a complex variety of housing needs to accommodate in one area especially one in a visually sensitive location.
- 1.4.5 The Travelling community have their own needs and the design and location of such sites especially if being planned close to the settled community, needs thoughtful planning and considerably more space than the number of traveller “pitches” being accommodated might suggest. This is due to the need for turning/manoeuvring space necessary to accommodate their numerous oversized vehicles.
- 1.4.6 It is an accepted fact (see House of Commons Select Committee Report on Gypsy & Traveller Sites 2003-4) that the travelling community have a higher usage of vehicles for everyday journeys than the settled community. Those vehicles also tend to be larger than average frequently involving light commercial vans & Lorries often towing trailers & caravans. As such we feel there would be highways problems when increased vehicular movements upon the already congested roads around the subject site will also have to cope with increased numbers of slowing turning & manoeuvring commercial vehicles with trailers/caravans.
- 1.4.7 The subject site has its own feeling of openness but any development for either the settled or travelling community at this location will also harm the openness of neighbouring sites in the Green Belt.
- 1.4.8 However, the potential for further harm beyond the area of the subject site and specifically to the town as a whole is of greater concern.

## 2.0 AFFECT ON THE TOWN AND SURROUNDING AREA

- 2.1 Whilst there has been a lot of evidence attempting to quantify the housing needs of the two Districts, we have not seen any evidence of an objective assessment of need within Chesham itself and it is therefore curious that the Local Planning Authority are consulting on Preferred Options before declaring what housing need they feel the town of Chesham could sustain or accommodate.
- 2.2 The NPPF states that planning authorities should strive to meet their needs “*unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the (NPPF) as a whole, or specific policies in the Framework indicate that development should be restricted’ (as it is with land designated as Green Belt)*”.
- 2.3 Whilst we can accept that the needs of both authorities combined might collectively total 5,800 new dwellings, and that some of that need should be accommodated within Chesham, the planning authorities appear to be seeking what Green Belt land they can release before assessing what the town could or should accommodate without causing harm to the wider community already living there.
- 2.4 We question why the local authorities are trying to accommodate so much of their housing needs in Chesham. It is suggested that a total 5,800 new dwellings are needed in the combined areas of South Bucks and Chiltern District.
- 2.5 If the Preferred Option Site No. 1 is to provide 900 of these dwellings, this represents nearly 16% of the total need in both Council’s districts. We contend that this is excessive and disproportionate and will place severe strain on the town and its infrastructure. Why are other towns in the two administrative Districts of South Bucks & Chiltern being denied their fair share of housing growth?
- 2.6 Given that a further quantity of new homes are also being suggested within Chesham on land yet to be identified that is not Green Belt, the additional 900 homes on land to the northeast of the town within the subject site will create harm to the town as a whole.
- 2.7 We believe that additional homes can be provided in the town outside of areas of Green Belt designation or on unused brownfield land that will be less harmful to the area.
- 2.8 We also feel that the local Council are grossly underestimating the potential provision in non-Green Belt areas. For example the draft HELAA suggested only 463 dwellings could be provided within Chesham on brownfield sites including just 130 on Asheridge Road. However, applications are currently pending for 162 units at #90 Asheridge Road & a further 30 on the former Enterprise Centre in Asheridge Road. Just these two sites alone can provide 192 units which is nearly 50% more than was suggested in the Evidence Base for that road. This supports our view that the Council are significantly underestimating the provision from brownfield sites in the town.
- 2.9 Given that other non-Green Belt opportunities are available locally at the time of this Consultation (and the Chesham Society have a proposal for many more homes within the town), we feel that these other opportunities for housing provision in Chesham are being ignored at the expense of seeking to develop on Green Belt first. This is wrong as Government guidance advocates that brownfield opportunities must be explored before Greenfield development is considered.

- 2.10 Whilst infrastructure in the town will limit the quantum of any additional housing the town can accommodate, it is less harmful to the town if such new homes are built nearer to or in the town centre.
- 2.11 Chesham Underground station is close to capacity already. It is a single track railway service and the frequency of trains and its capacity to move people cannot easily be increased. Even if it could where would commuters park, especially if travelling from the subject site which we contend is beyond reasonable walking distance.
- 2.12 Also, Chesham station is “the end of the line” so it only offers transport options south on to the Underground network and there is no opportunity to go north other than by car or by bus. Other locations in the two Districts do not suffer from this constraint. Consequently, the development of the subject Green Belt site will generate more car and bus traffic in the town on roads that are already at or exceeding their design capacity.
- 2.13 This will result in further congestion in the town (as we have seen by as much as 400%) and this in turn will create more pollution for all those in the town.
- 2.14 The main road through Chesham, the A416 is already designated as a Congestion Management Zone, and Broad Street/Berkhampstead Road is an Air Quality Management Area. This increase in congestion and air pollution will be injurious both to health and the local economy as Chesham will become a place to avoid.
- 2.15 The infrastructure in terms of drainage, water supply and water treatment is already under strain and therefore proposals to develop the subject site will just make things worse.
- 2.16 Similarly, development of the Green Belt Preferred Option Site No. 1 will place additional demands on the schools that are already at capacity as well as upon doctor’s surgeries and dentists in the town.
- 2.17 Development on this site will adversely affect biodiversity in this location. The site contains a number of areas of well established & possibly ancient woodland as well as numerous hedgerows. The Planning Authority’s own Sustainability Appraisal of the Chiltern and South Bucks Local Plan produced earlier in January 2016 states that, *“Development at this site is likely to result in a loss of habitats of principal importance, including a loss of hedgerows and habitat connectivity at the site. Any species of principal importance associated with the habitats present will also be lost”*. We are aware of evidence of at least 18 different species of threatened or endangered wildlife that have been observed on the subject site. Of these, 9 are on the RSPB “Red List” and are confirmed as having been seen on this site by records from the Royal Society for Protection of Birds (RSPB) or the British Trust for Ornithology (BTO) or the Bucks & Oxon Wildlife Trust (BBOWT).

### 3. CONCLUSION:

- 3.1 We contend that the Green Belt Preferred Option Site No. 1 is unsustainable.
- 3.2 The proposed expansion of Chesham by developing this site to the NE of the town represents a disproportionate quantity of the homes required by both District Councils at a location that is;
- too far from the town centre, shops and community facilities,
  - too far from a train station that itself is at the end of the line, which can only offer a limited service, and
  - which is poorly accessed by two roads that are too narrow or already too busy.
- 3.3 The methodology of site selection is flawed and inconsistent with national guidance. Most importantly there has been no demonstration of “exceptional circumstances” to warrant this site being removed from Green Belt designation.
- 3.4 We also contend that the proposed development of 900 homes will cause significant harm to the neighbouring open countryside, as well as cause harm to wildlife, generate congestion and pollution within the wider town area and worsen air quality and it will also result in sprawl and coalescence of communities.
- 3.5 The development will also cause great strain upon the existing infrastructure notably the highways, public transport, drainage and water treatment facilities which cannot easily be improved as well as placing further strain on local schools, and medical facilities. Collectively, this will have a significant adverse effect upon the amenity of the town as a whole.
- 3.6 Accordingly, Preferred Site Option No 1 should be removed from any further consideration for removal of Green Belt protection or proposed future development.