



Chiltern
District Council



South Bucks
District Council

Chiltern and South Bucks Local Plan Initial (Regulation 18) Consultation Inc. Issues and Options Response Form

This is **YOUR** chance to get involved in the Local Plan process and state what **YOU** think the plan should address or include as well as provide your views on the Issues and Options identified. The Local Plan Consultation Document asks 17 questions, however please **do not feel limited by these questions and include any points you think are relevant.**

This form has **two parts**:

PART A respondent (your) details, which **will not be published**; and

PART B for comments, **which will be publically available**. If needed continue your comments on separate sheets.

Please note responses received as part of this consultation cannot be treated as confidential. All comments that have been made will be made public and included in Council documents displayed on the Councils' websites. However, no personal details, other than the respondent's name, will be made public. Responses submitted to Chiltern or South Bucks District Council will be processed and shared between the two Councils. Chiltern District Council and South Bucks District Council are the Data Controllers for the purposes of the Data Protection Act 1998.

This form is also accompanied by an **Equality Monitoring Form**. Respondents are encouraged to complete this as the data will be used to tailor and improve future consultations to ensure we reach and enable responses from all parts of the community. **Individual data collected from this Monitoring Form will remain confidential** with only summary results being published.

Please return your completed forms to Chiltern District Council or South Bucks District Council by post or by email to:

The Planning Policy Team
Chiltern District Council
King George V House
King George V Road
Amersham
Bucks
HP6 5 AW

planningpolicy@chiltern.gov.uk or ldf@southbucks.gov.uk

All Consultation Responses must be received by 5 pm on 14th March 2016.

If you would like to discuss any matter relating to this consultation please contact a member of the Planning Policy Team during normal office hours on (01494) 586 678 or (01895) 837 210 or by the email addresses provided above.

PART A – PERSONAL DETAILS

Are you:

A resident An organisation Other (*please specify*)

Personal Details*

Agent's Details (if applicable)

**Title <input style="width: 90%;" type="text" value="Mr"/>	
**First Name <input style="width: 90%;" type="text" value="Phillip"/>	
**Last Name <input style="width: 90%;" type="text" value="Plato"/>	
Job Title (if on behalf of an organisation) <input style="width: 90%;" type="text" value="Director"/>	
Organisation (if applicable) <input style="width: 90%;" type="text" value="Deer Park Walk Management Ltd"/>	
**Address <input style="width: 90%; height: 100px;" type="text" value="c/o 2 Deer Park Walk
Chesham
Bucks
HP5 3LJ"/>	
Telephone Number <input style="width: 90%;" type="text" value="7836201390"/>	
**Email Address <input style="width: 90%;" type="text" value="pjp@platoestates.com"/>	

**if an agent is appointed, please complete only the title and name boxes and, if applicable, the organisation box but complete the full contact details for the agent.*

***Mandatory fields if you wish to be added to the consultation database (see below).*

Consultation Database

The Councils have a joint Planning Policy Consultation database used to keep individuals and organisations informed about Planning Policy Documents across both Council areas. Documents include: the Local Plan, Supplementary Planning Documents and Neighbourhood Plans, (please note some plans may not be applicable to your area).

Chiltern District Council and South Bucks District Council are the Data Controllers for the purposes of the Data Protection Act 1998. Individuals and organisations on the Planning Policy Consultation Database will only be contacted by the Councils in relation to the preparation and production of planning policy documents. The Councils will not publish the names of those individuals on the database but may publish names of statutory bodies and organisations at certain stages of the Local Plan process. Please indicate if you want to be added to the joint consultation database.

I agree with the above statement, please add my details (Part A) to the Chiltern and South Bucks Planning Policy Consultation Database.

Please note: if you are currently on either the Chiltern or South Bucks Planning Policy Consultation Database you will need to 'opt-in' to the new database (by ticking the box above) to continue receiving notifications.

PART B – RESPONSE

Please complete this section for comments you wish to make.

Please **do not include any personal details** that you do not want disclosed, as this section will be made publically available.

If you are answering any of the questions in the Consultation Document¹ (i.e Questions 1 to 17) then please clearly state which parts/answers relate to which question(s). The questions are there as prompts but responses can relate to any matter you consider is relevant.

Continue on separate sheets if necessary.

This Statement is submitted on behalf of Deer Park Walk Management Ltd who manage the common areas & general estate represented by the 14 homes in Deer Park Walk off Lycrome Road, Chesham, Bucks.

The Directors of the company object to the strategic employment & housing sites to the north-east of Chesham, as proposed by the emerging Chiltern and South Bucks Local Plan (2014-2036), initial Regulation 18 and Issues and Options Consultation.

Specifically, to the land indicated in the plans on page 30 within Appendix 2 & on Page 45, Appendix 5 of the Consultation Document.

The former appears to relate to land currently designated as Green Belt to now be proposed as areas of new housing development. No information is given as to its potential residential capacity. However, if it were developed at an indicative density of 30 dwellings per hectare this would amount to an indicative capacity of some 1980 dwellings.

The latter appears to indicate potential strategic employment also currently designated as Green Belt, to now provide new local employment opportunities to allow some existing and outdated employment sites in the town to be redeveloped for other uses. The area of search is substantial, occupying approximately 173 hectares.

Deer Park Walk Management Ltd, OBJECTS to both these proposed housing and employment allocations to the north-east of Chesham for the following reasons:

The Buckinghamshire HEDNA identifies a need for 7,300 new homes and 2 hectares of employment land in the Chiltern District over the plan period. In respect of QUESTION # 1 of the Consultation Document, we have had little opportunity to scrutinise the HEDNA which we note was only published in late January of this year. In the limited period of time available to examine this important document, we question some of the methodology & assumptions used that reached the aforementioned conclusion of need within Chiltern District.

Accordingly, for similar reasons to those stated above, we have concerns in respect of QUESTION #2 of the Consultation Document regarding the HELAA. Again we have had limited ability to scrutinise this document in the time available but it seems that in the process of preparing the HELAA, many hundreds of other sites with similar planning constraints & similar material considerations to those sites promoted in the Consultation Document, have already been rejected or discarded from future consideration.

There appears to be an implied preference to seek larger sites that theoretically could meet the needs within Chiltern District. We respectfully submit this expediency sacrifices too many important long standing planning considerations. Specifically, those related to Green Belt development restraint policy which for many years have prohibited almost all development in the area in question sometimes supplemented by Article 4 Directions which have rightly preserved the "openness" of this general location. It seems perverse that the Local Authority have studiously enforced such development restraint policy for generations but are not proposing to release such a large are of land for new development. We feel the needs for the number of houses & area of

¹ Available at www.chiltern.gov.uk/planning/localplan2014-2036 or www.southbucks.gov.uk/planning/localplan2014-2036

employment land are themselves open to question but we cannot accept that even if correct, the way to satisfy that alleged need is to seek a small number of large sites for development. The impact on the area would be excessive and frankly is unnecessary.

In terms of housing, the Consultation Document implies that the land to the NE of Chesham should satisfy some 27% of the total houses needed in the whole of the Chiltern District for the whole of the plan period to 2036. We think this is unfair and unsustainable. Specifically we feel the burden of such quantum of additional housing in such a relatively small town as Chesham, is disproportionate.

We contend that many other sites already rejected from the HELAA should be reconsidered. It seems strange that many of the reasons that have excluded other sites from consideration of future development such as policies related to the Green Belt, preserving openness, unsustainability, poor highways access or potential injurious affects on air quality, wildlife & natural habitat or loss of agricultural land, have not resulted in similar conclusions that the areas to the NE of Chesham are also unsuitable for similar reasons. All those planning considerations apply equally & possibly more so, to the subject areas to the NE of Chesham. Similarly, reasons cited purporting to be uncertainty as to whether the other sites would be available for sale or not are by themselves insufficient for a site coming forward for development consideration and need to be researched in more detail.

Given the fact that such significant development is now being proposed in the Green Belt, we feel that most of the sites and all those of similar designations that were formally discounted in the HELAA should be reassessed and that they are all brought forward for public consultation.

Development of the NE of Chesham as proposed would result in the sprawl of Chesham town and of Chesham thereby consuming the nearby historic village areas of Ashley Green, Orchard Leigh, Lye Green & Whelpley Hill which would then all lose their individual identity. We feel these concerns relates to QUESTION # 6 & QUESTION #11 of the Consultation Document.

If development were more evenly distributed across a wider number of similar areas, we contend the overall impact and harm to this Green Belt area would be mitigated considerably. Indeed, we contend that it would be more appropriate to locate growth on the edge of larger principal settlements outside the Plan area such as High Wycombe, Uxbridge, Slough and Maidenhead. This appears to relate to QUESTION # 4 & Question # 5 of the Consultation Document where we contend the approach & priorities in the Consultation Document are flawed.

We suggest that the emerging Plan would also conform more with the National Planning Policy Framework (NPPF) if the two local planning authorities defined a network and hierarchy of centres that are resilient to anticipated future economic changes and that meet the needs of their catchment population. According to the Slough Express on 29 February 2016, it was reported that Slough Councillors accept this method and are going to ask South Bucks & Chiltern Councils to consider a major urban expansion of Slough in preference to sacrificing large areas of the Green Belt & agricultural land in areas where there is not sufficient infrastructure to cope with major expansion. The opinions of Slough Councillors should be explored in full therefore.

Both of the areas land that are of concern to us have poor or restricted vehicular access, notably along Lycrome Road. Any highway works necessary to make access suitable would be expensive and may require compulsory purchase not just of land, & gardens but of people's homes too as there are a number of houses that directly abut Lycrome Road itself. As such, hardship would be caused and uncertainty for home owners would be created throughout the 20 year plan period. We contend this is unfair given the scale of potential proposed development which is disproportionate to the size of Chesham compared to much larger settlements in the Districts.

Similarly, public transport links to Chesham generally are poor.

The rail service to Chesham cannot cope with more trains to accommodate increased commuter traffic. We are advised there is no scope for increasing the number or frequency of trains to/from Chesham station, which itself is the "end of the line" with no ability to commute to the north. As such the only method of transport to serve any expansion of the town is by road using either an enhanced bus service or individual cars.

Roads in and out of the town are already congested. We have only again recently experienced gridlock in Chesham for several days whilst some modest roadworks requiring temporary traffic lights were in place. The town also regularly suffers from congestion particularly if there is any disruption on the M25 between Junctions 17 & 20 when many motorists then leave the motorway and divert through Chesham along the A416 to the A41 or vice versa. On these days, traffic into & throughout the town is also brought to a crawl. Further vehicular traffic would be caused by the proposed expansion of the town to the NE and will make such an intolerable situation even worse.

On the assumption that the emerging Local Plan will seek to promote sustainable transport, it is hard to understand why the Local Planning Authority would support a large expansion of the NE of Chesham which would conflict with any such sustainable aspirations as it would then create significant increased vehicular traffic resulting in congestion & worsening air quality. The levels of Nitrogen Dioxide & other airborne pollutants in Berkhamsted Road, Chesham are already of concern and we respectfully suggest efforts should be made to actively minimise further deteriorations in air quality, traffic levels & congestion.

One must also consider the effects on schools and healthcare facilities within Chesham. Many doctors surgeries are at or close to capacity. Local schools too have limited scope for expansion or accommodating increased numbers. As such, we contend that Chesham is not capable of accommodating such a large expansion as proposed in the emerging Local Plan.

The fields around Deer Park Walk are poorly drained and regularly flood. We have witnessed in previous years excessive rainwater run off from these fields that has been sufficient to flood & temporarily close Lye Green Road on a number of occasions. We contend the flooding risk or the consequences of new development creating further flood risks elsewhere in the locality, has not been adequately considered and is therefore another reason why the areas to the NE of Chesham are unsuitable for release for new large scale development.

Due to the very limited size of the settlements within Chiltern and South Bucks, it is inevitable that people living in such new development locations will commute out of the Districts, either going to or from work as well as to shop, at the much larger settlements which surround it. In respect of QUESTION # 5, the best solution for Chiltern and South Bucks would be to locate new housing growth in areas that are close to the larger principal settlements of High Wycombe, Uxbridge, Slough and Maidenhead, in order to facilitate a more sustainable pattern of development.

Also of concern in respect to QUESTION #4 & QUESTION #5 of the Consultation Document is the assertion derived from The Housing Market Area (HMA) & the Functional Economic Market Assessment (FEMA) that "There are no significant market relationships between Chiltern/ South Bucks & Hertfordshire." We contend this assertion is flawed & further consideration of this assertion may expose why the suggested employment area to the NE of Chesham is inappropriate.

We contend that there are other areas of potential employment land, that either straddle the District boundary or are close within Hertfordshire borders. One such example would be the former Bovingdon Airfield which although designated as "Green Belt" has prevailing development and uses upon it which make it more akin to brownfield land. As such, it would therefore be more in accord with Government Policy of "brownfield development first", and given its size, location and the various commercial uses already taking place upon the former concrete runways, would make it more suitable for employment uses than the area to the NE of Chesham AND with less potential loss of good quality agricultural land. Under the "duty to co-operate" with neighbouring Planning Authorities, this and other employment sites within Hertfordshire must be explored, especially around Hemel Hempstead. These options should be exhausted before Green Belt land & the "openness" it preserves is sacrificed.

In respect of QUESTION # 14, we would be interested in discussions with the Parish Council & similar local groups to consider the formation of a Designated Neighbourhood Group to create a Neighbourhood Plan under the provisions of the Localism Act 2011 for specific policies covering the areas around Lye Green where the

detail of any housing need might be more thoughtfully considered & this sensitive location could be more proactive in playing its part in accommodating its fair share of development needs.

Finally, the proliferation of electricity pylons across the fields surrounding Deer Park Walk would suggest that either any housing development must be kept a sufficiently safe distance from these cables or that the cables are either relocated or buried at considerable cost. There are a significant number of both large steel pylons (of circa 132Kv) and of wooden pylons (of circa 33Kv), This therefore further casts doubt on the suitability of this area for residential development of any high density.

CONCLUSION:

For the reasons outlined above, it is not considered that the proposed strategic housing and employment sites to the north-east of Chesham are sustainable, or offer the most appropriate strategy for delivering the required growth in jobs and housing.

Given the relatively small scale of the settlements within Chiltern and South Bucks, it is considered that a much more sustainable option would be to locate employment and housing growth adjacent to the principal settlements outside the Plan area, including Wycombe, Uxbridge, Slough, and Maidenhead. These settlements are far larger than the more modest towns in Chiltern and South Bucks, and have much better access to employment, social facilities, shops and services, and public transport. Accordingly the heirarchy of sites being considered in the emerging Local Plan is flawed and inconsitent with the NPPF.

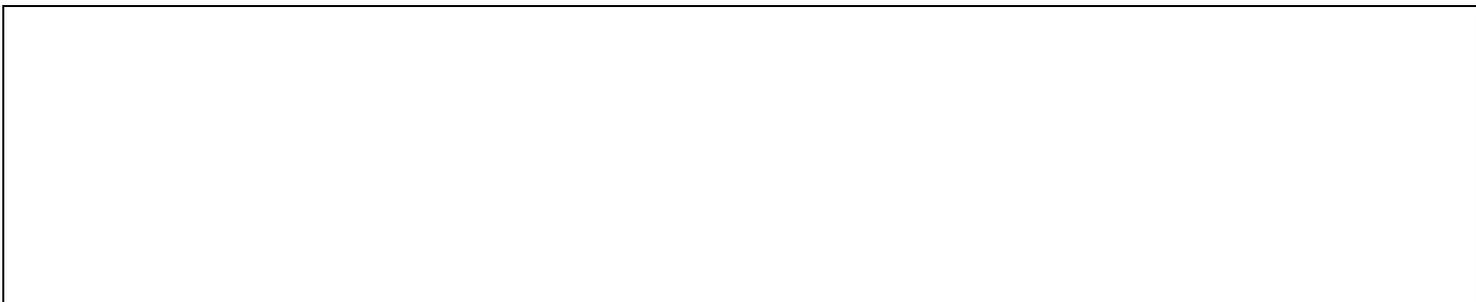
It is accepted that some growth is required around towns such as Chesham, but as stated the HEDNA & HELAA should both be subject to closer scrutiny and review. We contend the scale or requirements is potentially overstated but any growth should be proportionate to the relatively limited size of the settlement.

The land to the north-east of Chesham is NOT considered an appropriate location for large scale strategic employment and housing growth.

The proposals would have a significant injurious effect upon the town in terms of increased traffic congestion, when air quality in the town is already of concern & the existing roads are struggling to cope with prevailing traffic level. Existing rail infrastructure is already at capacity and cannot easily be further upgraded, whereas other larger settlements in the Plan Area have infrastructure which can already accommodate growth or which can be expanded more cost effectively.

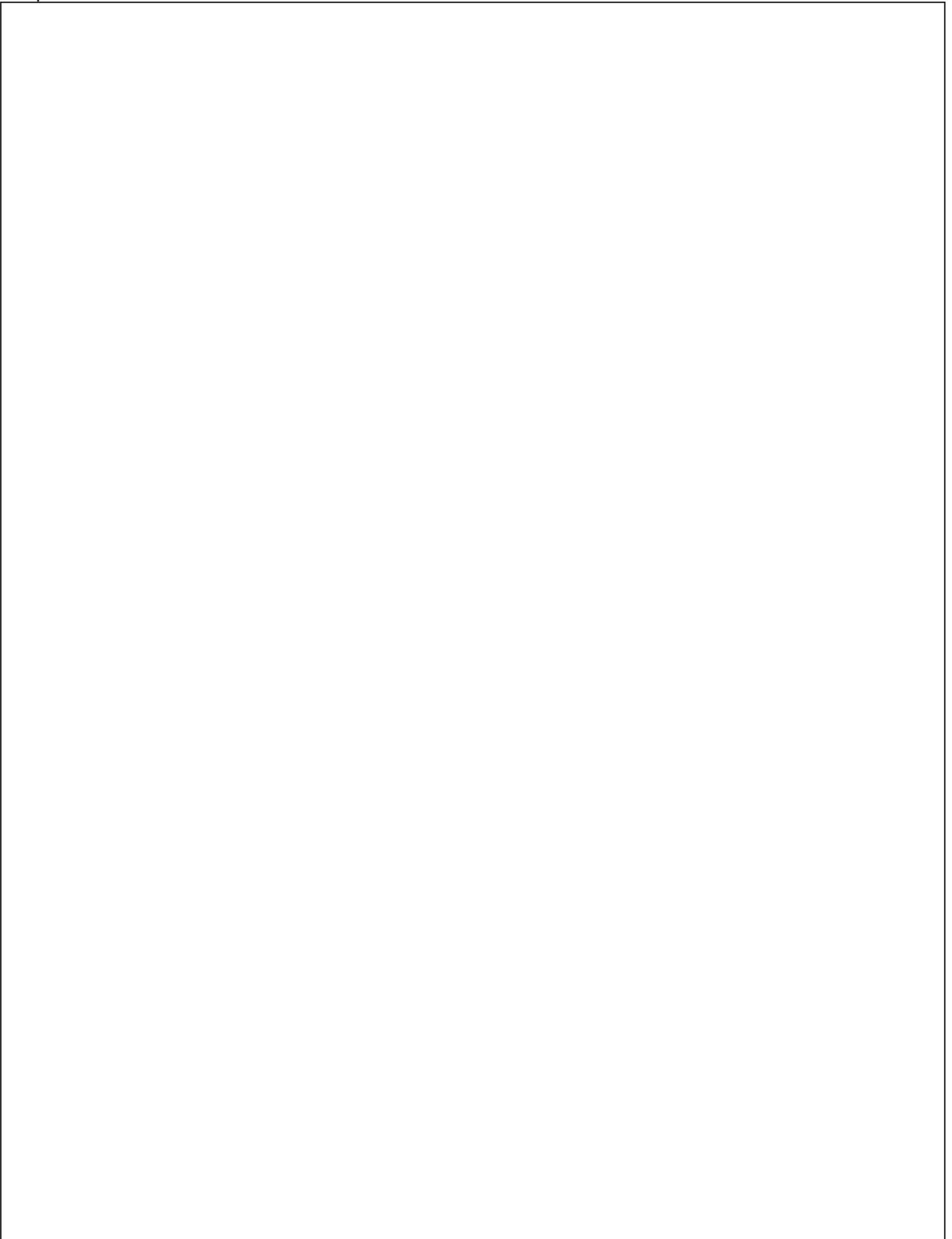
Any highways works to improve immediate access to Lycrome Road would directly affect existing residents in that road & may require some households there to be displaced from their home due to their proximity to the edge of the existing road. Overhead power lines are also a concern in respect of the proposed residential development in the fields around Deer Park Walk.

The Green Belt policy is preserving the openness of an area together with other development restraint policies which have been strenuously enforced over many years to good effect. Whilst it is acknowledged that some of these areas might be released for some modest scale of developments or infilling, it is inappropriate to release such large areas for development, at the cost of loosing good quality agricultural land & thereby effectively expand the town so dramatically when there are many other areas where these needs could be accommodated thereby mitigating the effect on this one neighbourhood.



Please also complete the Equality Monitoring Form.

Separate Sheet





South Bucks District Council

Chiltern and South Bucks Local Plan Equality Monitoring Form

Chiltern District Council and South Bucks District Council are committed to promoting equality, and will not place anyone at a disadvantage because of any aspect of their age, disability, ethnic origin, marital status, race, religion, gender or sexuality.

This monitoring form is designed to help the Councils understand which parts of the community respond and to improve future consultations.

The information you give us on this form is confidential. As it is a joint consultation between the two Councils, information will be processed and shared between the two Councils but only summary results will be published.

Should you have any questions about the information asked, please contact a member of the Planning Policy Team during normal office hours on (01494) 586 678 or (01895) 837 210 or by email: planningpolicy@chiltern.gov.uk or ldf@southbucks.gov.uk.

1. How did you hear about this consultation? (Tick more than one if necessary)

Email/ Letter.....	<input type="checkbox"/>	Twitter.....	<input type="checkbox"/>
Local Press.....	<input type="checkbox"/>	Facebook.....	<input type="checkbox"/>
Council Website.....	<input type="checkbox"/>	Word of mouth.....	<input checked="" type="checkbox"/>
Other (please state below)			

2. What is your Gender?

Male	<input checked="" type="checkbox"/>	Female	<input type="checkbox"/>
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3. How old are you?

Under 15.....	<input type="checkbox"/>	15 - 19.....	<input type="checkbox"/>	20 - 24.....	<input type="checkbox"/>	25 - 29.....	<input type="checkbox"/>
30 - 34.....	<input type="checkbox"/>	35 - 39.....	<input type="checkbox"/>	40 - 44.....	<input type="checkbox"/>	45 - 49.....	<input type="checkbox"/>
50 - 54.....	<input type="checkbox"/>	55 - 59.....	<input checked="" type="checkbox"/>	60 - 64.....	<input type="checkbox"/>	65 - 69.....	<input type="checkbox"/>
70 - 74.....	<input type="checkbox"/>	75 - 79.....	<input type="checkbox"/>	80 - 84.....	<input type="checkbox"/>	85 or over.....	<input type="checkbox"/>

4. Do you consider yourself to have a disability?

Yes

No

5. What is your ethnic group?

A White

English/Welsh/ Scottish/ Northern Irish/ British.....

Irish.....

Any other White (state below).....

B Mixed / Multiple Ethnic Groups

White and Black Caribbean.....

White and Black African.....

White and Asian.....

Any other Mixed /multiple ethnic background, (state below).....

C Asian / Asian British

Indian.....

Pakistani.....

Bangladeshi.....

Chinese.....

Any other Asian background, (state below).....

D Black / African / Caribbean / Black British

African.....

Caribbean.....

Any other Black background, (state below).....

E Gypsy or Irish Traveller

Gypsy.....

Irish Traveller.....

F Other Ethnic Groups

Any other ethnic group, (state below).....

G Do not want to say.....

Thank you for taking the time to complete this monitoring form. Please also let us know if you have any ideas on how we can improve our consultation processes to ensure equality.