

# CHALFONT St. PETER PARISH COUNCIL

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Clerk: Mrs Debbie Evans

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14<sup>th</sup> March 2016

Graham Winwright, Planning Policy Manager  
Chiltern District Council  
King George V House,  
King George V Rd,  
Amersham HP6 5AW

Dear Mr Winwright

**RE: Chiltern and South Bucks Local Plan Initial Consultation (Incorporating Issues and Options) - Chalfont St Peter PC Representations**

Troy Hayes Planning Limited (Troy Planning & Design) has been instructed by Chalfont St Peter Parish Council to assist in the preparation of representations to the Chiltern and South Bucks Local Plan (Regulation 18) Issues and Options Consultation. On behalf of the Parish Council, we have undertaken a detailed review of the material presented as part of the consultation alongside the published evidence base and other associated documents.

Troy Planning & Design has extensive experience of the plan-making system, having contributed to a number of post-NPPF adopted Local Plans as part of work in the public sector and engaging with the preparation and Examination of numerous other emerging plans representing both public, private and voluntary sector interests.

The intention of South Bucks and Chiltern District Councils to bring forward a new Local Plan at the earliest opportunity is an objective which we support and is echoed by the Parish Council and other stakeholders with interests in the plan area. The adoption of up-to-date planning policy offers the best opportunity to implement and safeguard the sustainable development of the area and is consistent with the Government's objectives for the planning system in terms of supporting future growth to meet the objectively assessed needs of the area.

Having reviewed the background to the consultation, it is necessary to express a number of significant concerns in relation to the evidence base and potential policy approaches which must be addressed at the earliest opportunity to ensure that effective policies are developed for the Chiltern and South Bucks Local Plan area.

The decision to pursue a Joint Local Plan inevitably introduces new elements of complexity to the plan-making process and it is essential that the implications for these are well understood at the earliest

opportunity. For example, the authorities acknowledge that the “Buckinghamshire” Housing Market Area (HMA) is being used as a ‘best fit’ analysis for the purposes of joint plan-making whereas in reality the plan area is split between two functional housing market areas (Central Buckinghamshire and Reading / Slough [‘Berkshire’]) driving the demand for jobs and housing; alongside the significant influence of the Greater London conurbation.

In addition, the decision to prepare a Joint Local Plan requires the consideration of a new settlement hierarchy and interpretation of the spatial relationship between different settlements and locations. For Chalfont St Peter, this is particularly critical given the essentially contiguous built development connecting the settlement with Gerrards Cross. The evidence base for the Joint Local Plan does not provide any conclusion that “the whole is greater than the sum of its parts” as a result of this scenario and in considering the subsequent options for the Local Plan. Notwithstanding this physical connection, the two settlements have little if any history of being planned for jointly in terms of infrastructure or the approach towards housing development. This creates a distinct relationship that must first be understood before assessing the contribution that any options for growth that directly affect the urban fabric of both distinct settlements make to the overall strategy for sustainable development.

Finally, both Chiltern District and South Bucks Council have separate histories of plan-making and records of delivery against Core Strategies adopted prior to the introduction of the NPPF. The residual elements of these strategies, in terms of outstanding planning commitments and existing allocations, presents a baseline which must not be overlooked when providing for the additional requirements of the new Local Plan.

As far as possible, the response in these representations is provided within the framework of questions for the Issues and Options Consultation provided by Chiltern and South Bucks Councils. However, we would argue that the questions are themselves improperly limited in scope, in that they do not directly allow respondents to address the key issues of the extent to which they consider exceptional circumstances justify the adjustment to Green Belt Boundaries or the Duty to Cooperate relationship between Chiltern and South Bucks as well as beyond the Local Plan area. The latter is particularly significant, in that if it subsequently transpires that the Duty has not been complied with then the requirements for plan-making will not be met and the Local Plan incapable of adoption.

Our key conclusion at this stage of the consultation would be that there is a lack of clarity in the nature of Issues and Options being presented to relevant stakeholders at this time. The various matters introduced above and covered in more detail in the representations below highlight significant uncertainties in the understanding of local places and how these might affect the contribution to the most effective overall spatial strategy. These concerns are exacerbated by the fact that the various options presented as the basis for much of the consultation material are relatively silent as to the scale of growth expected to be accommodated.

We comment on the emerging Sustainability Appraisal throughout (see especially 5.24) and acknowledge that it represents an early stage of plan preparation. However, it will be essential to refine this evidence significantly to ensure outcomes are scored consistently and also to fully reflect the overall levels of development being provided and scale of specific locations; as well as their spatial relationship with the wider plan area.

In summary, we would argue that the presentation of detailed potential options is inappropriate at this consultation stage due to significant gaps in evidence and in the absence of conclusions on the scale of growth that might be accommodated. To include such options may risk pre-judging the choices subsequently supported by the evidence base for relevant policies. However, these representations are offered in the spirit of co-operation to assist in identifying the most appropriate strategy for the area.

Although the Joint Local Plan is currently at an early stage of preparation, there are significant gaps and flaws in various aspects of the technical evidence. As these representations highlight, the partner Councils are some way from identifying any 'Preferred Option' amongst those presented until further work is completed. However, it can be shown that any approach which considers concentrating a higher proportion of [an as yet undecided level] growth at Chalfont St Peter demonstrates an extremely high likelihood of being found 'unsound'. This is anticipated on the basis of a lack of justification or consistency with national policy in the evidence presented and as not clearly representing the most effective strategy for the plan area as a whole.

Our view is that these issues should be addressed through a significant review of the evidence base and sustained engagement with local communities potentially affected by any proposed strategy in order to understand its likely effects. Not least, we consider that engagement with local councils including Chalfont St Peter should form a key part of the Green Belt Study (Part 1 and Part 2). We consider that this can be achieved within the timetable for the plan-making process to refine the nature of options being considered and establish a Preferred Option which can provide net gains across the social, economic and environmental strands of sustainable development as required by national policy.

Please treat this letter as part of our representations to the consultation.

The Parish Council has formed a joint working party with the local community action group, SENSE 4 CSP. They support this representation and will also submit their own response.

We trust these representations are constructive as CDC moves towards the preparation of its preferred option consultation document. As already stated, we consider the need to involve local people and local councils in the preparation of the plan and its evidence (particularly the Green Belt Assessment) to be of critical importance to ensure the plan meets the legal requirements of the Planning Act and soundness tests of the NPPF.

We look forward to working with you over the coming months.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Troy Hayes', written in a cursive style.

**Troy Hayes (BSc, MSc, MRTPI, AICP)**

Managing Director – Troy Planning & Design on behalf of Chalfont St Peter Parish Council

## **Commentary on National Policy and Guidance:**

The following comments are relevant to the consultation as a whole and should be read alongside each of the responses to the later questions, which more specifically deal with the local policy framework and evidence for policy-making and implications for the spatial options at Chalfont St Peter. In general, the commentary has greater relevance for the 'strategic' questions presented at Questions 1-7 of the consultation material, although they represent relevant considerations for plan-making as a whole.

### *Duty to Cooperate:*

- 1.1. The decision of Chiltern District and South Bucks District Councils to prepare a Joint Local Plan is one which is supported in principle. Paragraph 156 of the NPPF sets out the cross-boundary *strategic priorities* for plan-making such as provision for transport, community services and facilities and water and energy infrastructure. Similarities between the two locations support the joint gathering of information and use of resources to provide comprehensive evidence and effective policies which support co-operation and deliver the development and infrastructure that the areas need and this is consistent with the aims of sustainable development.
- 1.2. However, notwithstanding the potential advantages of these arrangements, the evidence presented as part of the Issues and Options Consultation highlights concerns that the approach will overall satisfy the requirements of the Duty to Co-operate in-line with national guidance. This requires that in accordance with NPPF Paragraph 179 the strategic priorities for plan-making can be co-ordinated and delivered across local authority boundaries as part of the most effective strategy to meet the overall needs of sustainable development.
- 1.3. The issue with the emerging Joint Local Plan as it affects Chiltern District, and Chalfont St Peter in-particular, is the lack of clarity in terms of distributing growth in the overall interests of sustainable plan-making. Chiltern District Council has previously expressed an initial view that it would likely be unable to meet all housing needs identified in the District, when considering the scope of its own new Local Plan<sup>1</sup>. Such conclusions in essence reflect the extensive coverage of Green Belt designations in addition to the dispersed pattern of development across relatively minor settlements affected by a range of constraints in the built and natural environment (e.g. lack of public transport infrastructure and Chilterns AONB designations).
- 1.4. Under such a scenario, and having since firmly concluded that the entirety of Chiltern District falls within the 'Central Buckinghamshire' HMA identified from relevant evidence, the justification that any unmet needs arising from Chiltern District might conceivably be accommodated (as far as consistent with national policy) in the Districts of Wycombe and Aylesbury Vale is further advanced.
- 1.5. This matter is complicated as part of the preparation of a Joint Local Plan, identifying a greater overall requirement across the 'best fit' basis for the Buckinghamshire HMA. In terms of the 'consequences for sustainable development' identified in national policy as part of considering any review of Green Belt boundaries, we would argue that the decision to pursue a Joint Local

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<sup>1</sup> <http://www.chiltern.gov.uk/CHttpHandler.ashx?id=5758&p=0>

Plan makes little if any material difference for what exceptional circumstances might exist in terms of the purposes of the Green Belt or wider contribution to sustainable development and may justify identifying a given location for potential development.

- 1.6. Paragraph 47 of the NPPF sets out that local planning authorities should *“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”*. National Planning Practice Guidance is clear that such assessments of needs will not necessarily override constraints for use of land, such as Green Belt designations (ID: 3-044-20141006).
- 1.7. In their response to the Vale of Aylesbury Local Plan Consultation 2013-2033 (dated 4<sup>th</sup> December 2015), Chiltern and South Bucks District Councils formally state in their representations that they anticipate that the Vale should seek to accommodate an unmet need of between 7,500 to 10,000 dwellings across the two authorities. The representations go on to acknowledge that this is likely to be a significant challenge for the Buckinghamshire authorities, but that precedence should first be given to meeting needs from across the HMA. The representations at Paragraph (f) also state:

*“In terms of the Chiltern and South Bucks Local Plan anticipated unmet needs, the councils formally request the opportunity for these to be met within the Aylesbury Vale Local Plan. This request takes account of the current Memorandum of Understanding (and anticipated changes to it referred to above), our evidence bases and an understanding through Duty to Co-operate discussions with others related to the Chiltern and South Bucks Local Plan that there will not be alternatives open to the councils to accommodate their unmet needs. Despite this latter point the councils will continue to explore the scope for alternatives and will inform your Council if other opportunities are to be tested.”*

- 1.8. It is important to highlight that as at February 2016, the previous Memorandum of Understanding (MoU) between the authorities of Aylesbury Vale, Wycombe and Chiltern District Councils has not in-fact been updated. An Addendum has simply been produced that recognises South Bucks District as a constituent party to the Memorandum and the revised assessment of the ‘best fit’ Buckinghamshire HMA.
- 1.9. The addition of South Bucks Council as a further signatory, substantially affected by similar constraints to Chiltern District in terms of Green Belt and AONB, almost inevitably adds to the burden of unmet needs likely to arise from the broader area across which needs are being addressed. The MoU ultimately, at paragraph (d) envisages the relatively unconstrained parts of the HMA free from AONB and Green Belt designations and located in Aylesbury Vale as being better placed to meet any such unmet need.

1.10. However, there are significant concerns with this approach in terms of its ability to satisfy the Duty to Cooperate and wider implications for plan-making. It remains an important fact that the majority of South Bucks, in terms of population and land area, falls outside the Central Buckinghamshire HMA as originally identified. As now proposed, the MoU places a greater strain on meeting a higher level on unmet need within the Central Buckinghamshire HMA.

1.11. It is important that earlier in paragraph (d), the MoU sets out that:

*“Only if needs cannot be met fully within the HMA will consideration be given to needs being met outside the HMA with authorities that have the next strongest functional links”*

1.12. In terms of South Bucks District, the starting point for evidence is inconsistent with the principles of the MoU, insofar as the strongest linkages can already be shown to be with authorities outside the Buckinghamshire HMA, including Slough, Maidenhead and Wokingham. This has potentially important strategic implications, primarily in terms of whether other locations in the Buckinghamshire HMA are best-placed to meet unmet needs as a whole, taking into consideration the potentially wider consequences for sustainable development.

1.13. National policy acknowledges that evidence such as Travel-to-Work Areas (NPPF Paragraph 180 and NPPG ID: 9-008-20140306) are relevant in identifying relationships under the Duty to Cooperate and it is clear that there is a wide range of influences on the Chiltern and South Bucks local plan area. As a means of reducing risks and the burden of the Duty to Cooperate for plan-making in areas with potentially complex arrangements, guidance states *“Local Planning Authorities should have explored all available options for delivering the planning strategy within their own planning area”* (NPPG ID: 9-003-20140306).

1.14. Reporting of work under the Duty to Cooperate is required to demonstrate a proactive, positive and ongoing approach to strategic planning and partnership working as part of national guidance (NPPG ID: 9-004-20140306). At present, and in the absence of published Authorities Monitoring Reports for the period 2014/15 to support the current consultation, the evidence falls some way short of the reporting requirements for this ongoing engagement

1.15. However, we support in principle the identification of potential extensions to settlements outside the Joint Local Plan area (and Buckinghamshire HMA) as relevant Options for the current consultation (Question 6 Option D). Wherever possible, and in order to best reflect the functional relationships and strategic priorities of the plan area, it is considered that these or similar options are likely to form the basis of an appropriate spatial strategy for the area. However, it is not clear that such outcomes fall within the current intentions of the signed MoU.

1.16. Given the relatively proximity of large parts of South Bucks to nearby larger settlements, these functional linkages might provide greater support to justifying the release of further land within the District to meet housing needs closest to where they arise, as well as potentially on the edge

of towns such as Slough and Maidenhead (on land which may also be within South Bucks) or seeking to meet unmet needs within the adjoining authorities. Ultimately, the outcomes for sustainable development are likely to be similar and reduce the pressure on meeting unmet needs solely within the Central Buckinghamshire HMA potentially less well-related to where they arise.

- 1.17. This would also allow a greater proportion of any unmet needs arising in Chiltern District to be more directly associated with the other parts of the Central Buckinghamshire HMA. Such potential outcomes have been well-documented in earlier rounds of plan-making and would not be unexpected in terms of their potential impacts and the consequences for sustainable development.

*Exceptional Circumstances:*

- 1.18. Paragraph 83 of the NPPF recognises that Green Belt boundaries should only be reviewed in exceptional circumstances, such as through preparation of a new Local Plan. This is an issue which clearly falls within the scope of the Issues and Options consultation and the subject of these representations. NPPF Paragraph 84 goes on to state that:

*“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”*

- 1.19. Evidence produced as part of this consultation provides some of the initial information required for such a review, such as the Phase One Green Belt Review providing an indication of areas of land which it may not be necessary to keep permanently open and locations which make a more limited contribution to the purposes of land designated as Green Belt. However, NPPF Paragraph 85 also requires Local Authorities to *“ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development”* when defining or reviewing Green Belt boundaries.
- 1.20. Consideration of these identified requirements is complicated in the circumstances of preparing a Joint Local Plan, particularly in Chiltern and South Bucks where demand is generated as part of a combination of overlapping housing markets and the final evidence is based on a ‘best fit’ (i.e. the Buckinghamshire HMA) for plan-making purposes. National policy acknowledges that evidence such as Travel-to-Work Areas (NPPF Paragraph 180) are relevant in identifying such relationships and it is clear that there is a wide range of influences on the Chiltern and South Bucks local plan area. Given the greater overall aggregate requirement that is generated by applying the ‘best fit’ HMA across the whole of both authorities, it becomes critical to

understand the contribution that different specific locations might make to genuinely sustainable patterns of development.

- 1.21. Paragraph 14 of the NPPF sets out that for plan-making, the presumption in favour of sustainable development should be applied as follows:

*“Local planning authorities should positively seek opportunities to meet the development needs of their area;*

*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

*– any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

*– specific policies in this Framework indicate development should be restricted [including land designated as Green Belt as set out in Footnote 9]”*

- 1.22. In Green Belt terms, it can be argued there is little if any material difference between the need to apply the NPPF as a whole when considering boundaries (as described above) and the basis for deciding planning applications in the Green Belt which requires potential harm through *inappropriateness* and any other harm to be outweighed by other considerations (NPPF Paragraph 88, our emphasis).
- 1.23. Aside from the point that the Local Plan should seek to meet objectively assessed housing needs ‘as far as is consistent with the policies set out in [the] Framework (NPPF Paragraph 47) and that the extent and purposes of Green Belt land may comprise one circumstance that may restrain an Authority’s ability to achieve this (NPPG ID: 3-045-20141006), Local Plans as a whole must contribute to the objective of achieving sustainable development (NPPF Paragraph 151).
- 1.24. The approach adopted by Chiltern and South Bucks District Councils as part of the Issues and Options consultation – in testing various options against an undefined scale of growth and only partially complete evidence from the Green Belt Review, does not allow robust conclusions to be expressed on the extent to which exceptional circumstances are demonstrated or sustainable development will be ensured.
- 1.25. This is critical, as simply the decision to prepare a Joint Local Plan should not affect the test of exceptional circumstances for locations such as Chalfont St Peter and conclusions on unmet need when considered alongside parts of South Bucks which were, until recently, being assessed as part of a different Housing Market. This understanding of the relationship between locations within the settlement hierarchy and their overall potential to contribute towards sustainable development is an important counterpart to any test of exceptional circumstances.
- 1.26. In reaching the final conclusions for any future Preferred Local Plan Options, stakeholders should clearly be able to identify the justification for the extent of provision associated with different locations, such as at Chalfont St Peter. At present, the scale of any of the various

Options identified appears largely unknown as is the basis on which they are being tested. For example, the identification of potential Options on the basis of reducing the overall extent of unmet needs - either in the absence of potential solutions being identified in South Bucks District or to reduce the overall burden of unmet needs to be sought from elsewhere in the Buckinghamshire HMA – may not in itself be considered sufficient to meet the test of exceptional circumstances. Other alternatives might better achieve the objectives of sustainable development. This greatly reduces the weight given to the merits of the locations identified in the Issues and Options consultation as a matter of planning judgment (however consistently or thoroughly reached), such as those selected from the Phase One Green Belt Study. There is an absence of a clear approach towards exceptional circumstances as part of the consultation material.

- 1.27. In summary, the evidence produced as part of the current consultation does not clearly set out the scale or any subsequent reasons for any significant scale of growth being identified within Chalfont St Peter. For the reasons expanded upon later in these representations it can be demonstrated that Chalfont St Peter would be expected to make a very limited contribution towards further levels of strategic growth, beyond the extensive planning commitments and existing allocations already identified at the settlement.

## **Response to 'Issues and Options' Consultation Questions**

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

- 2.1. Commentary on this question is largely addressed in our overall comments on issues in relation to the Duty to Cooperate. One additional principle concern in relation to the HEDNA regards the comments at Paragraph 14 of the document “HMAs and FEMAs in Buckinghamshire: The Impact of a Joint Plan for Chiltern and South Bucks” (January 2016), which states:

*“Chiltern and South Bucks Councils have agreed to consider development needs collectively across both districts, so the housing requirement and housing supply will be considered across the Joint Plan area. Given this context, the NPPF requirement to identify the “full, objectively assessed need for market and affordable housing” (paragraph 47) would need to establish the overall housing needs of the combined area.”*

- 2.2. This conclusion does not appear to be explicitly confirmed in the consultation material and neither partner local planning authority has yet published monitoring information setting out a calculation of land supply for the whole Joint Plan area or using the assessment of development needs in the Draft HEDNA.
- 2.3. There exists a number of Joint Local Plans across the country (for example in West Northamptonshire and Greater Nottingham) where housing land supply is not calculated or considered across the Joint Plan area (typically this often only concerns the contribution that large strategic sites make to adjoining areas or conurbations). The evidence for jointly calculating land supply between Chiltern and South Bucks is not clearly presented or justified in the evidence for the Issue and Options consultation. It is recommended that during the next stages of plan-making and moving towards Preferred Options this position is clarified and reviewed, however the preference should be for each District to calculate supply against its own needs in the first instance.
- 2.4. The principal reason for this is that the ‘best fit’ geography adopted for the purposes of Joint Plan-making does not change the underlying analysis that over half of the population of South Bucks District relates more closely to a Functional Market Area in Berkshire, based around Reading and Slough. As the assessment of housing requirements is prepared based on local authority boundaries, this means that a significant proportion of the drivers for growth in South Bucks District arise from more than one functional housing market.
- 2.5. This makes it important in the first instance to understand how any shortfall in housing supply may arise differently between the two Districts. The extent of housing land supply in Chiltern District should not automatically appear less in the event that there is an undersupply in South Bucks District given that both experience different drivers for growth. This also potentially implies that different locations between the two Districts may be under equal pressure to improve the overall supply and boost the supply of housing. However, where housing markets overlap this is not necessarily the case and the linkages and spatial relationships will be particularly important.

- 2.6. The same is also true when considering the overall extent of land that may be suitable for housing. Whilst the most appropriate and sustainably located strategic sites may be able to make a contribution towards the overall requirements for the Joint Local Plan area (e.g. areas with good public transport or straddling functional market area boundaries) this may not be the case for less sustainable locations such as Chalfont St Peter. Such settlements should not face greater cumulative pressure in the event of a land supply shortfall and unmet needs may be better met elsewhere, including at locations outside of the Joint Local Plan area.
- 2.7. The selection of the 2014-2036 date for the plan period is considered to be a reasonable and pragmatic choice which takes account that both Districts have had adopted Core Strategies in place (albeit pre-dating the NPPF). These were adopted under a different regime of regional and national guidance and also with 'capacity constrained' housing figures. The record of delivery against these strategies is therefore considered less directly relevant to the emerging Local Plan. However, it appears that appropriate adjustments are made for factors such as 'market signals' and the need for affordable housing which will take the past record into account. The plan period will also cover approximately three years prior to adoption of the Joint Local Plan, which will assist in monitoring patterns of delivery.
- 2.8. It must be stressed that locations identified within previous plans (including the adopted Chiltern Core Strategy) inevitably have different records of delivery for a variety of reasons. This reflects the unique circumstances of individual sites, such as their viability, availability and addressing key suitability and infrastructure constraints.
- 2.9. In a settlement such as Chalfont St Peter, the proposed plan period of 2014-2036 means that substantial existing commitments for large scale growth are effectively 'rolled forward' to contribute to the strategy in the Joint Local Plan. It is appropriate that such sites are not burdened by any perceived historic record of 'under delivery'. This position is critical to the understanding of the 'baseline' for individual settlements and should be the key determining factor as part of the 'Issues and Options' for the role of such locations in the strategy for the emerging plan period.

**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?**

**Question 3: Are there existing uses/sites 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?**

- 3.1. The following response relates equally to questions 2 and 3 within the Issues and Options Consultation material. In summary, the Housing and Economic Land Availability Assessment is an important document but the level of detail and methodology for identifying and assessing the suitability, availability and achievability of specific locations for a given scale of development currently falls well short of that required to fully establish the scope and most appropriate

spatial strategy within the Local Plan. It does not in itself provide the necessary detail to draw conclusions or exclude any one of the Options being considered at this stage of plan-making. Paragraph 3.2 of the Issues and Options Consultation Document acknowledges this:

*“The HELAA is not complete and is work in progress. The final HELAA will be important to determine the assumed level of development capable of helping to meet development needs. At this stage the following sources of land have not been included but will be considered as part of subsequent reviews”*

- 3.2. It is clear that the majority of detail is deferred to the later stages of the HELAA process. For example, the findings for sites at ‘Stage 2’ of the assessment are set out only briefly in Appendix 5 of the HELAA. It would be helpful if detailed pro-forma were released detailing the relevant considerations for individual sites.
- 3.3. In the same manner, whilst the exclusion of sites in the Green Belt from the assessment might be supported in principle, the HELAA is clear that this particular constraint might be overridden following the findings of the Phase One and Phase Two Green Belt studies. As the Phase Two Green Belt Study is still some way from completion, and the scale and detailed characteristics of sites to be looked at in more detail is unknown this raises doubt over whether the HELAA or Green Belt review will provide the final conclusions on whether a location is suitable.
- 3.4. As there is a reasonable likelihood of some locations in the Green Belt being explored in more detail, the HELAA should appropriately assess all opportunities and constraints on development at the earliest opportunity. To not do so risks important material considerations being overlooked and explored only for the first time in the Green Belt review. Similarly, awareness of these constraints might complement the findings of the Phase One Green Belt review and reasons for not undertaking any more detailed exploration. These comments are particularly relevant due to the fact that the partner Councils appear to have identified ‘Options’ for this consultation that are neither supported by the Phase One Green Belt Review or HELAA and the justification for these choices is highly unclear.
- 3.5. The range of sites considered by the HELAA is broadly appropriate. It appears almost inevitable that additional sites will be identified as part of this consultation. Such outcomes should be supported and the sites sieved and included in the later stages of the HELAA process wherever possible; particularly when they indicate an appropriate scale of development and on the most appropriate sites such as previously developed land.
- 3.6. Given the lengthy timetable for preparation of the Joint Local Plan, scope for continued engagement with local communities (and especially those preparing Neighbourhood Plans) should be supported. Where such engagement identifies additional locations or refines areas already identified to a scale which is appropriate and supported by local communities this may facilitate the most effective strategy for the Joint Local Plan.

- 3.7. It is also welcomed in principle that 'Stage 3' of the HELAA generally supports the identification of a 'Windfall' allowance. Delivery from such sites is likely to make an important contribution to supply given the wide range of constraints that affect much of the District. Ongoing monitoring and review of this source of capacity is supported, especially where it may identify additional contingency against delivery on identified locations.
- 3.8. It is important that the current Draft HELAA is not divorced from previous evidence and plan-making work in Chiltern District which sought to provide a comprehensive spatial strategy for the whole area. Here, we specifically refer to the (subsequently withdrawn) Delivery DPD for Chiltern District. This recognised the substantial allocations and major developed sites with scope for development identified in the adopted Core Strategy and sought to provide additional allocations and development management policies to complement these.
- 3.9. Paragraph 6.3 of the Pre-Submission Delivery DPD detailed the contribution of different sources to the overall requirement in the adopted Core Strategy. Table 2 set out a range of smaller housing allocations across a range settlements in the hierarchy that would make up the residual requirement having taken account of the strategic locations. It is important that Table 3 also acknowledged potential supply from a variety of other sources, including non-allocated SHLAA sites otherwise suitable for development; change of use outside of planning control; loss of previously protected employment land; and unidentified mixed-use proposals. Additional supply from such sources was expected to total around 300 dwellings from 2013 to 2026.
- 3.10. Although relatively minor, it is important that additional supply from such highly suitable sources is included as part of the Options for the overall spatial strategy. The HELAA appears to take some account of such sources (e.g. by including existing SHLAA sites and Prior Approval schemes). Given further recent changes to Permitted Development Rights, it is likely capacity from some of these sources may be greater than previously envisaged. It is recommended that the final version presents a detailed review of possible additional sources of supply. This would support the broadest possible assessment of potential opportunities for the delivery of housing as part of a comprehensive overall strategy.
- 3.11. In broad terms the locations identified as potentially suitable, available and achievable in HELAA Appendix 5 appear to be relatively modest in scale and provide an appropriate range of opportunities. This is without prejudice to the accuracy of any individual assessment and the view that there may well be additional sources of supply. The key point, however, is that there is little consistency between the extent of supply presently identified in the HELAA and the implication for larger, more strategic options introduced as 'Options' C and D for the wider consultation. This makes it extremely difficult for those responding to the consultation to understand the scale of growth which is being considered and whether this is appropriate.

**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.**

- 4.1. The approach to the Vision and Objectives is supported in principle. It is important that weight continues to be given to objectives for a comprehensive spatial strategy for the area set out in the adopted Core Strategy and which it was previously intended to further achieve through the Delivery DPD.
- 4.2. It should be further recognised that in addition to the Vision and Objectives in the adopted Core Strategy, to a large extent an adopted policy framework is already in place to achieve these. Policies and the locations for development identified to support them should be given a chance to succeed and may continue to indicate the most appropriate spatial strategy for an area.
- 4.3. In respect of Chalfont St Peter, the settlement already makes a key contribution towards a number of the 8 Core Strategy Objectives. This includes providing a high proportion of the 'appropriate amount of development' (Objective 1) and 'provision of specialist facilities and care' (Objective 7). This is reflected across a number of key policies, including the main strategic housing allocation at Holy Cross (Policy CS6); identification of land at Newland Park as a major developed site with further opportunities for housing (Policy CS7); and the major developed site at the National Society for Epilepsy comprising additional opportunities for employment and specialist care (Policy CS13).
- 4.4. These policy designations represent significant commitments and any subsequent revisions to the strategy must consider whether identifying further capacity for growth would further Objective 3 of the adopted Core Strategy and continue to 'steer development to the most sustainable locations'. These opportunities would be expected to make a significant contribution to the strategy in the emerging Joint Local Plan in any event but provide a necessary consideration for how any other opportunities are considered.

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

**Question 6: Do you have comments on individual options generally or specific settlements/site options that could be part of these options?**

- 5.1. For the reasons outlined throughout these representations, it is not considered that the material available as part of this Issues and Options consultation allows firm conclusions to be reached on any of the individual Options. This is particularly relevant in the absence of a completed Phase One Green Belt Review; an understanding of scale of possible opportunities to be explored further in the Phase Two Green Belt Review; or the comprehensive assessment required in the final HELAA.
- 5.2. In reality, it is likely that a combination of elements from the various Options are likely to comprise the most appropriate overall strategy for the area. This is particularly important in the context of a Single Local Plan for a joint area which must acknowledge the existence of

overlapping housing markets and influence from adjoining urban areas and comprehensively address the opportunities across the full range of settlements and development types.

- 5.3. On this basis, it is not necessarily considered appropriate to 'rank' the various Options in terms of priority. As set out in these representations, however, there is substantial evidence to argue against Option C and highlight that further significant built extension to Chalfont St Peter is unlikely to be an appropriate strategy in the context of the Joint Local Plan.
- 5.4. Identification of the final Preferred Option should also be based upon a detailed understanding of place and following full and extensive engagement with the affected local communities. This level of detail appears to be missing in the evidence for the joint Issues and Options consultation. Specific issues which may significantly affect the overall objectives for the plan and the most appropriate option for any given location (and its role in any settlement hierarchy) are explored in only general terms.
- 5.5. Further work should ensure a bespoke response for individual places. On this basis, commentary on the specific options below is provided in relation to Chalfont St Peter in the first instance, but also in respect of the contribution that the different options might make towards the overall strategy.

#### ***Option A***

- 5.6. Comments in relation to this option are largely provided as part of the response to Questions 2 and 3 in relation to the HELAA. National policy and guidance supports the assessment of the broadest possible range of locations. There are strong prospects to ensure that appropriate land uses (including residential) are provided in sustainable locations and of a scale likely to be supported by local communities as part of this Option, although in isolation such locations are unlikely to reflect the full range of opportunities and requirements for development that may be accommodated in the Joint Local Plan.

#### ***Option B***

- 5.7. A review of the designations mentioned, such as 'Established Residential Areas of Special Control' is supported in principle. This might be best undertaken by assisting local communities to prepare evidence such as Village Design Statements or as part of Neighbourhood Plans. It should be recognised that any review might identify opportunities for infill, growth or intensification, however where control remains relevant as part of the character of local areas then this may represent a constraint on the appropriate level of development.

#### ***Option C***

- 5.8. Significant concern is expressed as part of the potentially larger scale 'Options' for development identified at Chalfont St Peter in Appendix 2 of the Issues and Options Consultation Document. These concerns cannot be divorced from concerns regarding the deficiency in the overall evidence base in terms of the progress of the Green Belt Study, findings of the Sustainability Appraisal or understanding of the specific contribution Chalfont St Peter might make towards sustainable development (taking account of existing commitments).

- 5.9. Appendix 2 of the consultation material provides relevant caveats for the areas identified e.g. further assessment of suitability being needed and potential for smaller-scale release of land. However, it is a significant weakness of the evidence base for the Issues and Options consultation that the reasoned justification for identifying the specific locations cannot easily be identified and the 'Options' presented are silent as to the scale of development that might be considered.
- 5.10. For simplicity, in commenting we use the names for the various locations as set out in the Sustainability Appraisal and site codes from the HELAA for any associated sites already assessed. It is unfortunate, and confusing, that a similar convention is not applied in the main consultation document.

*Area of Search 1 (Housing) – 'Mill Meadow'*

- 5.11. Of particular concerns, 'Area of Search 1' for Chalfont St Peter explored in the Sustainability Appraisal ('CSP1') is part of Parcel 41b from the Green Belt Study and where the scoring results recommend no further consideration. Furthermore, the Option identified is associated with no sites identified in the HELAA (either rejected or recommended at Stage 2). The location is also affected by significant flood risk constraints. Identification of this location is essentially incomprehensible based on the evidence available and demonstrates a lack of regard for understanding the local area. Representations prepared by local community organisations provide a detailed commentary on community use of the land, which is fundamentally compatible with the Green Belt location. The findings at Paragraph 3.8.1 of the Sustainability Appraisal regarding a neutral impact on cultural heritage are inconsistent with scoring for 'purpose 4' in the Green Belt Study regarding the special character of historic towns which notes:

*"The land parcel plays an important role in protecting open land which has a strong connection with the historic core, contributing to its immediately historic setting."*

*Area of Search 2 (Housing) – 'Winkers Farm / Paccar Scouts'*

- 5.12. In principle, the basis for selecting 'Area of Search 2' ('CSP2') as identified in Appendix 2 of the consultation material can be relatively well understood from the evidence base for the emerging plan. Although suggested boundaries for further investigation in Part 2 of the Green Belt Study are not provided, the area shown as a potential 'Option' appears broadly consistent with the recommendations for Parcel 44a in the Phase One Study to explore the far north east of the parcel 'North of Hogtrough Wood'. It should be noted that the adjoining parcel 44b to the east achieves the maximum score for Purpose 3 of the Green Belt (in terms of safeguarding the countryside from encroachment). Any development within the option considered would need to be sensitive to the significant contribution to openness on adjacent land and support the transition to the open countryside.

- 5.13. The potential scale of development the area identified is not given and this appears to be a weakness in the evidence as a whole. However, the land area identified is generally modest and broadly consistent with sites also considered by the HELAA which total approximately 12.5ha. The current evidence does not fully acknowledge the range of ownerships and land uses across the site and an active history of promotion and planning activity at the site. It is understood that various community organisations will make detailed representations on these matters, such as the use of part of the area identified by local Scout Groups. A number of factors appear to affect the site and may reduce the overall scale of development considered suitable, not least the location's lack of sustainable transport options (Para 3.9.4 of the Sustainability Appraisal) and the potential loss of agricultural land.
- 5.14. Whilst in principle the location might ultimately be found suitable to accommodate a degree of development at a scale appropriate to the local area, the detailed issues involved would be best addressed through comprehensive engagement with the local community, including when preparing the Phase 2 Green Belt Study. In combination with further refinement to the overall requirement for development and preferred spatial strategy, this location might make some contribution towards the Local Plan as a whole.

*Area of Search 3 (Housing) – 'National Society for Epilepsy'*

- 5.15. 'Area of Search 3' identified in the Sustainability Appraisal ('CSP3') and as shown at Appendix 2 of the consultation material in relation to the National Society for Epilepsy is considered to be misleading and inappropriate for identification as a single 'strategic option' at this stage in the plan-making process. The large area identified as comprising the relevant option has a complex history of planning applications and existing policy designations; as well as a relationship with additional potential development associated with Newland Park immediately to the north.
- 5.16. Please note that the comments against this option should also be read in response to 'Option G', which seeks to explore the possible development opportunities associated with reviewing the Green Belt boundary associated with the National Society for Epilepsy.
- 5.17. The area identified within the consultation material is considered to be excessive and fundamentally unsuitable as a potential option. Whilst details of scale and precise boundaries are not given at this stage, it seems inconceivable that the full extent of land shown will be tested. In any event, the location is subject to numerous development constraints (principally the safeguarded route for HS2 and landscape impacts associated with the Chilterns AONB and Colne Valley Regional Park which fundamentally restrict any potential scale of development. However, it should be noted that the location as a whole is considered unsuitable for development and there appear to be extensive weaknesses in the scoring for the Green Belt Study and Sustainability Appraisals.
- 5.18. In principle, the consideration of the site as a single option is not appropriate in policy terms and does not take full account of the location's existing designation as a major developed site in the Green Belt under Policy CS13 of the adopted Core Strategy. The basis for this designation is

essentially consistent with the site's history, function, character and contribution to the purposes of the Green Belt. The existing designation has demonstrably supported the area's ongoing active use and contribution to key objectives of the adopted Core Strategy such as the provision of specialist care (which are expected to remain central to the emerging Local Plan).

- 5.19. This designation provides a broadly appropriate policy framework for the site. It is noted that four sites in the HELAA are recommended for further assessment and supported as suitable at Stage 2 (CD0129, CD0130, CD0192 and CD0193). In the case of the latter two, extant permissions support the provision of specialist accommodation consistent with the main characteristics of the site and also providing local employment. Although the recommendations for sites CD0129 CD0130 may require some flexibility within the existing policy framework, they are modest in scale and represent redevelopment of previously developed land and are therefore not unacceptable in principle. However, beyond this it is not considered that there is any necessity for a review of the Green Belt boundaries as suggested in 'Option G' of the consultation material and nor would this support substantial opportunities for residential development within the context of the wider site.
- 5.20. The strategic contribution that the area might make towards the overall requirement for housing is not defined or clearly set out within the evidence base. No other HELAA sites are identified in relation to the area beyond those mentioned above. The description of land that may be appropriate for further investigation based on Parcel 38a is imprecise and could equally refer to the previously developed parts of the site or areas of greenfield land. Given the extensive area shown in the consultation material, the community should be engaged at the earliest opportunity when presenting boundaries for the Phase Two Study.
- 5.21. In summary, we consider that the remaining parts of the parcel (outside previously developed land as part of the National Society for Epilepsy) should be considered separately and are not appropriate to make a contribution towards the housing needs of the area.
- 5.22. Within the scoring for Parcel 38, the maximum score of 5-out-of-5 for purpose 2 ('preventing neighbouring towns from merging') is welcomed and acknowledges the close proximity of this area with the nearby settlement of Chalfont St Giles. However, the remaining three purposes can be considered individually and cumulatively undervalued due to a misreading of the location's contribution to the Green Belt and character of the local area. It is understood that local community organisations, including SENSE4CSP and Colne Valley Park, will provide more detailed commentary on these aspects. However, key evidence is provided by the Buckinghamshire and Milton Keynes Historic Towns Project (2014)<sup>2</sup> and the detailed assessment of Chalfont St Peter undertaken in 2011<sup>3</sup>. The area around 'CSP3' is identified as a separate character area ('Chalfont Colony') and achieves a Medium or High score for all four (evidential, historical, aesthetic and communal) heritage values. This contrasts with much of Chalfont St Peter and reflects a character largely untouched by modern development. The characteristics of the location therefore represent long-standing boundary features and establish the historic

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<sup>2</sup> <http://www.buckscc.gov.uk/media/1914822/historic-towns-report.pdf>

<sup>3</sup> <http://www.buckscc.gov.uk/media/1609860/Chalfont-St-Peter-Final-Report.pdf>

relationship with the open countryside as part of the landscaped setting. Four Listed Buildings are also located within the parcel, close to the edge of built development. It is therefore completely unjustified for the parcel to score 0-out-of-5 for 'Purpose 4' of the Green Belt. The carefully managed pattern of development at the National Society for Epilepsy has also significantly assisted in preventing the countryside from encroachment.

- 5.23. Within the Sustainability Appraisal, a potential significant adverse impact on landscape is identified. This is consistent with the comments above and is welcomed. However, it is not considered accurate that development outcomes are recorded as potentially positive for cultural heritage (see Para 10.3.1). Although the SA does not confirm the scale of development being considered, it should be noted that planning policy supports the redevelopment of heritage assets when this better reveals their significance. Given the highly sensitive nature of the surrounding area, such outcomes are only likely to be achieved by small-scale redevelopment immediately associated with the setting of affected assets. Any larger scale development is likely to fundamentally change the character of the area and this must be acknowledged.
- 5.24. A number of other findings in the Sustainability Appraisal also appear inconsistent. In particular, the potential positive effects identified for transport do not properly reflect the area's location distant from rail connections and surrounded by narrow country lanes (see Paragraph 3.10.4). These views contradict the finding of potential negative effects from other locations (such as 'CSP1') which properly acknowledge the congested nature of links to key sustainable transport connections in Gerrards Cross (see Paragraph 3.8.4).
- 5.25. It is also relevant to highlight at this point that the summary of the pre-mitigation assessment given at Table 5.1 often records different outcomes to the individual assessments within the document. For example, the 'Transport' domain for CSP3 on Table 5.1 records a significant positive outcome ("++") compared to a slight positive outcome at Para 3.10 ("+"). Whilst we agree with neither assessment, this raises significant doubt on the robustness of the approach.
- 5.26. In addition, we consider that limited weight should be given to the 'post-mitigation' outcomes recorded in Table 5.2 given the extremely limited detail available for the individual options at this stage. This table almost ubiquitously records that positive outcomes can be achieved on any individual domain for any individual site. However, this is likely to give inadequate consideration of the cumulative effects and outcomes for actual development characteristics. For example, the scale of development needed to improve sustainable transport links from 'CSP3' could not realistically safeguard the landscape and heritage character of the area due to the extensive need for greenfield (Green Belt) land.
- 5.27. Finally, it is not considered appropriate for the potential option to extend up to and adjoin the strategic allocation at Newland Park (Core Strategy Policy CS7) where redevelopment of this major developed site in the Green Belt for housing is supported in principle. Whilst redevelopment of this specific location should not impact on the openness of the Green Belt, it is important that a separate identity is maintained for this area and it does not serve to justify a

further encroachment into Green Belt land in the area north of the National Society for Epilepsy. The existing commitment for around 300 dwellings on land at Newland Park is already secures a substantial contribution to any future requirements identified for the Local Plan.

- 5.28. On the basis of the above comments we do not consider that the location should make a contribution to the strategic needs of the Local Plan under 'Option C'. Following our representations as part of question 4 above (see especially Paragraph 4.3) it is also appropriate that the Vision and Objectives of the plan and subsequent spatial strategy recognises the existing strengths and opportunities of the area. Given the essential characteristics of the site at the National Society for Epilepsy and its role in providing employment, medical facilities and specialist care the material effect of opportunities to provide residential development as part of 'Option G' are considered to be contrary to the interests of the plan as a whole. An appropriate framework is provided by the existing provisions of Core Strategy Policy CS7, which in principle supports the ability to further enhance the location as an area of specialist care.

*Area of Search 3 [Gerrards Cross] (Housing) – 'Raylands Farm'*

- 5.29. In summary, the evidence base for the Issues and Options Consultation does not support the identification of a 'strategic' Option at this location. For the purposes of sustainability, the location is referred to as 'Area of Search 3' at Gerrards Cross ('GC3') whilst in reality approximately two-thirds of the land area identified is located within the Parish of Chalfont St Peter. Until very recently, following the decision to prepare a Joint Local Plan, any consideration of this location would have required extensive work under the Duty to Cooperate and a thorough understanding of the relationship between the two places. Such an understanding is lacking from the evidence for the current consultation.
- 5.30. Concern in principle is expressed towards the approach in the Phase One Green Belt Study, which includes the 'Option' identified within Parcel 47b. The key issue here is that the parcel extends between two distinct built areas (Beaconsfield and Gerrards Cross / Chalfont St Peter) and this inevitably complicates the range of considerations for how the parcel contributes towards the Green Belt purposes in various markedly different locations. Perhaps as a result of this, the pro-forma for the parcel assessment makes no reference to Chalfont St Peter and the important function in the eastern end of the parcel for maintaining a degree of visual separation from Gerrards Cross. In a localised sense, Purpose 1 and Purpose 2 of the Green Belt are likely to demand a higher score.
- 5.31. Notwithstanding the above, it is critical to highlight that the Phase One Green Belt Study makes no recommendation to further investigate this part of the parcel west of Gerrard Cross and Chalfont St Peter. The recommendation within parcel 47b is in fact for land East of Beaconsfield, well-contained by an existing golf course to the west. These conclusions are ultimately welcomed, and whether reached for the correct reasons rightly acknowledge the important contribution land west of Gerrard Cross / Chalfont St Peter makes in Green Belt terms and as part of the functional relationship between the two places. It is also relevant to highlight that 'Bull Lane' is specifically mentioned in the pro-forma as part of the existing defensible boundary.

This route is an important part of the character of the area and would inevitably be changed substantially by any significant development, undermining the area's contribution to the Green Belt.

- 5.32. No evidence within the HELAA currently indicates a strategic interest from landowners in this location to provide any further justification for exploring this option. Within the HELAA, site CD0032 (at Raylands Farm) has previously been promoted only on the basis of providing sport and recreation facilities ('leisure and recreation') – namely as part of joint consideration with land at CD0032 ('Gerrards Cross Tennis Club'). This would in effect be a land swap between the two locations, allowing residential redevelopment of the tennis club within the main built area. The HELAA acknowledges that the assessments and process of policy formulation cannot yet firmly support such a strategy, but in any case such an approach (which might be capable of support) does not indicate land availability for a strategic option and is a materially different proposal.
- 5.33. Finally, we would highlight the somewhat inconsistent findings for the location in respect of the sustainability appraisal. At Paragraph 3.16.4 the SA associates negative effects for transport with congestion in the area, lack of bus stops and car dependence. In principle, these concerns are valid and represent important local issues. It is also likely that any development of the location would involve significant transport impacts (potentially up to and including major alterations to the A40 to provide access) due to the nature of existing routes, which may exacerbate issues.
- 5.34. These conclusions are supported in isolation, and represent the high degree of constraint in bringing forward further significant strategic development at Chalfont St Peter or Gerrards Cross. However, they cannot logically be followed reading across other sites assessed in the vicinity. For example, 'GC3' is notably closer to the main services and facilities of Gerrards Cross and within 1km of a train station. Therefore, identifying negative effects from this site (although likely to be correct) is fundamentally inconsistent with identifying positive effects on other sites (such as CSP3 – National Society for Epilepsy) much further divorced from the main urban area and rail connections and at least equally affected by congestion.

#### ***Option D***

- 5.35. Please see the response to Question 7 below and also in relation to our representations under the Duty to Cooperate. It is encouraging that potential locations have been identified at Appendix 3 to the consultation document as part of this Option and we consider that these may, where appropriate, make an important contribution to the overall Preferred Strategy and relieve pressure on less sustainable locations such as Chalfont St Peter.

#### ***Options E, F, H and I***

- 5.36. It is not intended to comment in detail on these various options, but in principle the Green Belt Review should support a comprehensive review of existing boundaries wherever appropriate. As the full outputs and Report for the Phase One Green Belt Review are not published as part of the consultation material, it is not possible to identify the precise scope of recommendations that may result.

- 5.37. It is an important aspect of national policy (NPPF Paragraph 86) that Green Belt designations should not be used to restrict development where other controls may be more appropriate, therefore in principle Options F and H may identify further appropriate opportunities for infill development.
- 5.38. It is also appropriate in principle for the Green Belt Study to identify 'sub-strategic' scale parcels as part of Options E and I that may make a contribution towards development requirement. However, taking account of the complex settlement pattern across the plan area and the need to maintain the separate identity of places, the scale of opportunities may be limited. For example, considerations regarding the effect on openness and potential for coalescence should apply equally for any change to Green Belt boundaries south of Chalfont St Giles as much as they are a relevant constraint to development to the north of Chalfont St Peter.

#### **Option G**

- 5.39. Please see comments regarding the National Society for Epilepsy considered under 'Option C' above.

#### **Option J**

- 5.40. Please see our response to Question 7 below and representations under the Duty to Cooperate. Great weight should be given to any options identified on the basis of this option due to their greater potential to contribute towards sustainable development and reflect the functional linkages across the plan area. It should be noted that there is an intention to support options for growth presented on this basis as part of the impending review of the National Planning Policy Framework.

#### **Option K**

##### *Area of Search 1 (Employment) – Gerrards Cross and Chalfont St Peter*

- 5.41. The evidence base for the Joint Issues and Options Consultation is not considered to support the identification of the strategic employment 'Option' for Chalfont St Peter and Gerrards Cross shown at Appendix 5 of the consultation document. The extent of land shown is unclear, but almost certainly crosses both parcels 57a and 57b as explored in the Green Belt Study.
- 5.42. The strategic need for additional employment land at Chalfont St Peter and Gerrards Cross is not justified by the evidence. The table at Paragraph 2.6 of the consultation document indicates a need of only 2ha of employment land in Chiltern District. A need of up to 13ha is quoted for South Bucks District. It is important to highlight that whilst the 13ha requirement quoted reflects Figure 133 of the Draft HEDNA, Figure 133 actually suggests there is no land balance requirement or shortfall in terms of the needs of Chiltern District.
- 5.43. Following our comments at Paragraph 5.29 above, it is critical that the position of the location within both Chiltern and South Bucks Districts is recognised and would otherwise require substantial work under the Duty to Cooperate. Given that the employment land shortfall is

substantially weighted towards South Bucks District, which predominantly falls within a different functional market area, in the first instance we would suggest that Gerrards Cross and Chalfont St Peter do not represent the most appropriate location to meet any employment needs in the plan area.

- 5.44. Consultants GL Hearn undertook site assessments for employment location in Chiltern and South Bucks in 2013<sup>4</sup>. There is an urgent need to update these assessments and understand local demand, with anecdotal local evidence indicating a high degree of existing vacancies in the area. This includes the 'Chalfont Park' site east of the A413 within the 'option' identified, but also other sites across the built area. In-particular at 'The Vale, Churchfield Road' employment land was previously shown to be relatively underperforming.
- 5.45. A further concern is that no indication of the potential scale of employment uses to be generated is provided. It is also important to note that in the HELAA, sites CD0064 and CD0132 reflect Call for Sites Submissions presented on the basis of proposals for residential development. This is at odds with the basis for identifying the location as an 'employment' option in this consultation. Only site SB0025 (in South Bucks District) appears submitted as a promotion for 'mixed-uses'. None of the submissions referred to above cover land east of the A413, as shown in the consultation material. It cannot clearly be concluded through the evidence that the location is being considered solely for employment uses.
- 5.46. It should be noted, in relation to the concerns over scale and overall demand set out above, that national policy advises against the long-term protection of employment land where there is no reasonable prospect of it being delivered. The exceptional circumstances to consider this option now are not clearly made, but in any event if the land was released from the Green Belt and allocated, there is a significant likelihood it will not be delivered as employment floorspace. Any future pressure to release the land for housing (a basis on which it is not currently being considered) would be equally unsuitable in terms of loss of tree cover, amenity impact from the adjoining road and encroachment into the Green Belt (preventing enduring boundaries). It would also be entirely contrary to the objectives for plan-making set out in this consultation.
- 5.47. In terms of the Green Belt Study, the finding that parcel 57a makes a limited contribution to the overall purposes and may warrant further investigation is acknowledged, however this in no way indicates overall suitability for development. In-particular, the loss of extensive tree cover would have a significant impact on amenity. It is also important that the parcel assessment notes that *"Despite its close association with the settlement edge, the parcel still retains a largely rural open character"*. These findings cannot be considered in isolation, as the 'option' also comprises parts of parcel 57b, where no further investigation is recommended. The area east of the A413 also experiences significant additional constraints (especially flood risk). To provide development on both parcels and accommodate these constraints would represent a significant cumulative impact and change in local character.

**Question 7: Do you have comments on the suggested level of unmet needs in Chiltern/South Bucks?**

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<sup>4</sup> <http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7742&p=0>

- 6.1. As stated elsewhere as part of comments under the Duty to Cooperate, there is significant doubt about the efficacy of directing any unmet needs from across the Joint Local Plan area to other locations in the Buckinghamshire Housing Market in the first instance. This ultimately places a greater burden on the Buckinghamshire HMA as a whole and its ability to deliver overall identified requirements. In turn, this may also place greater pressure to provide for an inappropriate level of growth at individual settlements within the Joint Local Plan area such as Chalfont St Peter in order to reduce the overall shortfall. This is despite significant drivers for growth deriving from the separate Berkshire Functional Housing Market Area.
- 6.2. The overall level of unmet needs will ultimately depend on how fully the various different 'Options' are explored. It is considered that it may be beneficial for the overall strategy and level of unmet need that some scope for growth is achieved through 'Option D' (noting scope for extensions to major towns such as Slough that are well-related to parts of South Bucks) and 'Option J' to more intensively use land around transport hubs. However, these will ultimately be specific choices for later in the plan-making process.
- 6.3. Taking into account the full considerations for plan-making, it is anticipated that a significant unmet need is likely to arise wherever the test for exceptional circumstances is not clearly demonstrated and potential options cannot demonstrate how they would most effectively contribute towards achieving sustainable development. The implications for sustainable development must take account of the specific characteristics of places and their wider functional relationships with the surrounding area.
- 6.4. In respect of a settlement such as Chalfont St Peter, taking into account the extensive Green Belt and development constraints, relatively unsustainable location and high level of existing commitments the overall contribution towards meeting additional requirements for development is likely to be limited. One would anticipate that similar circumstances across the Joint Local Plan area will generate a significant overall unmet need for housing.

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

- 8.1. We have no specific comments on this question. In general terms, it should be stated that affordable housing is likely to be secured with greatest effect as a proportion of delivery on sites contributing a greater scale of development. In addition, the consequences for social and economic sustainable development are likely to be most positive where development is genuinely accessible by sustainable transport means and well-related to higher level services and facilities. These aspects combined might support the allocation of larger scale 'options', albeit only in the most sustainable locations. For the reasons set out in these representations, the 'options' identified at Chalfont St Peter should not be considered to fall within this scope.
- 8.2. Beyond the points above, policies should be sufficiently flexible to support additional affordable housing where possible. In-particular this might include further local engagement to support the identification and delivery of 'exception sites' to meet locally identified needs and developing a

positive approach towards emerging initiatives such as ‘starter homes’ especially on previously developed sites.

**Question 9: Do you have any comments on the above options to meet the needs of Gypsies, Travellers and Travelling Showpeople?**

- 9.1. We have no specific comments on this question. There are a number of sites in Chalfont St Peter already. There is the potential to increase the number of pitches on an existing site, The Orchards. This was supported as a Preferred Option as part of earlier work on the Chalfont St Peter Neighbourhood Plan and Chiltern District Council should engage with this process as part of deciding on any ‘next steps’.

**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?**

- 10.1. Although we have no specific comments on this question, it should be acknowledged that the existing adopted policy framework has led to the settlement of Chalfont St Peter making a significant contribution to the need for specialist accommodation. It is important that the policy framework might continue to support and enhance this role to best deliver the type and mix of housing needed across the District.
- 10.2. Please see also our comments under Question 4 and Paragraph 5.28 which set out that within the objectives of the plan as a whole, the opportunities to provide further specialist accommodation within Chalfont St Peter (especially at the National Society for Epilepsy) should be explicitly supported by the policies of the Local Plan.

**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.?**

**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?**

- 11.1. In relation to both Questions 11 and 12, please see our response to Question 7, in-particular against the identification of the National Society for Epilepsy as part of ‘Option C’. It may be considered that the existing evidence base does not take sufficient account of evidence for designated and non-designated heritage assets and their significance. Local communities are often best-placed to provide an understanding of these aspects. In general, we would support the principle of a comprehensive Heritage Assessment or similar study being prepared for local areas (perhaps as part of an Environmental Character Assessment or wider evidence base for Neighbourhood Plans). It should be recognised that such studies might raise important considerations to shape the objectives of the Local Plan.

**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**

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

- 12.1. Having extensively reviewed the consultation material and background for the current stage on the emerging Local Plan, we strongly assert that Chalfont St Peter should not provide any large scale residential development to meet identified housing needs, beyond the extensive scale of existing commitments and policy allocations. The settlement is in a relatively unsustainable location compared to other settlements in the hierarchy and should not be directly associated with providing for the proportion of needs arising in South Bucks District and more closely associated with the Berkshire Functional Housing Market Area. In any case, potentially effective arrangements are being explored to provide for unmet needs in more appropriate locations.
- 12.2. In light of this, Chalfont St Peter appears better-positioned to accommodate a very limited scale of growth. This might best be secured through further co-operation and agreement with the local community. Further progress on the Chalfont St Peter Neighbourhood Plan provides an appropriate response to address the issues explored in Questions 13 and 14 above and also to identify the most appropriate opportunities for growth in the settlement.

**Question 15: Do you have a view on the scope of policies proposed in Appendix 7.**

- 13.1. We have no specific comments on this question at the current stage of consultation.

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

- 14.1. Presentation of a 'baseline assessment' of Infrastructure Capacity is welcomed in principle as part of the consultation material<sup>5</sup>. However, to a significant degree this highlights the lack of overall evidence available to support the various 'options' identified or specify the scale of development they might be able to support.
- 14.2. One particular concern is the identified infrastructure deficit for 'Waste Water' ["sewerage"] management at Chalfont St Peter. The need for improvement to the Maple Lodge Treatment works is acknowledged in Figure 7 of the report and further work needed to explore this specifically set out in Paragraph 63.
- 14.3. The timetable for potential resolution of these issues is detailed in Section 7 of the report in terms of the Water Cycle Study. Paragraph 82 confirms that for Chiltern District Council arrangements are in place to complete this evidence, working with relevant providers. However, no results are due until summer 2016, which imposes a fundamental initial constraint on identifying any Preferred Option incorporating significant growth.
- 14.4. However, in the context of preparing a Joint Local Plan (and given the fundamental spatial relationship with Gerrards Cross) it is of significant concern that paragraph 84 of the study states arrangements are still being agreed to complete a study for South Bucks. To provide robust and credible evidence we would recommend that evidence is prepared jointly, with an identical timetable for both authorities and following engagement with local communities. This provides further justification for our view that the preparation of a Joint Local Plan in no way indicates

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<sup>5</sup> <http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7749&p=0>

that a strategic level of development should be directed towards Chalfont St Peter or Gerrards Cross given these potential gaps in key, combined evidence.

**Question 17: Do you have any other points you would like the councils 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?**

15.1. We have no specific comments on this question