Chiltern and South Bucks Local Plan
Examination in Public
Consultation form

You should try to support your representation by evidence showing why the plan should be modified. It will be helpful if you also say precisely how you think the plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication.

Where there are groups who share a common view on how they wish to see a plan modified, that group should send a single representation. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Part A – Personal details

For your comments to be submitted to the Inspector, you must provide contact details

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Organisation (if representing one)

SENSE
WWW.SENSE4CSP.ORG
Part B - Legal Compliance, Soundness and Duty to Co-operate

Plan-Level: Legally Compliant

A Local Plan is considered legal when it is compliant with section 20(5) (a) of the Planning and Compulsory Purchase Act 2004, including:

- Has regard to the National Policy and guidance issued by the Secretary of State.
- Has been prepared in line with Local Development Scheme
- Whether appropriate notifications have been made.
- Whether a Sustainability Appraisal has been done and made public.
- Whether the Plan meets the requirements of the Habitats Directive and the Conservation of Habitats and Species Regulations 2010

Do you consider the Local Plan to be legally compliant

Yes □ No ☒

Please give details of why you consider the Local Plan is/is not legally compliant, including references to relevant legislation, policies and/or regulations.

The Local Plan is not legally compliant, inter alia, as it is in breach of the National Planning Policy Framework ("NPPF"), in particular, by selecting sites for removal from the Green Belt in Chalfont St Peter which are not justified and do not show exceptional circumstances for removal.

The Local Plan also breaches its own sustainability policies. It has been poorly prepared with a weak evidence base. Please see further below.
Are you proposing a modification to make the Local Plan legally compliant and/or to strengthen its compliance?

Yes ☒  No ☐

Please set out your suggested modification(s) below: You will need to say why this modification(s) will make the Local Plan legally compliant/strengthen its legal compliance

It is quite possible that there are too many things wrong with this Local Plan to tinker with it to make it legally compliant and/or sound. However, proper selection of Building Places is important with the two proposed sites in Chalfont St Peter being removed from the Plan and retained in the Green Belt and more appropriate site selection for development being evident. In particular greater use of previously developed and brownfield sites is required. There is no evidence that brownfield sites have been properly considered. The Plan does not properly maintain or deal with the Green Belt boundaries in Chalfont St Peter and in particular in relation to the Epilepsy Society site, the policy would not protect the Green Belt at all but weaken it significantly by removing a solid and defensible boundary and replacing it by virtually nothing at all.
Plan-Level: Soundness

Is the Local Plan:

- Positively prepared? Providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified? An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective? Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy? Enabling the delivery of sustainable development in accordance with the policies in the National Policy Framework.

Do you believe this plan meets the tests of Soundness?

Yes □    No ☒
Please give details of why you consider this Local Plan is/is not sound, include references to relevant legislation, policies and/or regulations.

The plan is fundamentally unsound.
We have previously submitted representations to the consultations carried out in January and December 2016. We are disappointed that the majority of the points we made then have clearly not been considered properly and have certainly not been dealt with properly by CDC. We raised a number of important questions and comments in those responses and nowhere has CDC explained how it has taken those comments into account or how it has considered those comments. This calls into question the process behind the Local Plan Consultation and suggests it is in breach of the National Planning Practice Guidance ("NPPG") and that the Local Plan is inherently unsound.

In relation to the Green Belt generally the requirement is to show "Exceptional Circumstances" for removal of land from the Green Belt. As mentioned above in our previous comments in relation to this lack of exceptional circumstances have not been dealt with adequately by CDC or at all.

In particular paragraph 84 of the National Planning Policy Framework ("NPPF") is relevant in relation to sustainable development specified toward urban areas inside the Green Belt boundary, and towards towns and villages. The two sites proposed for Chalfont St Peter are outside town or village centres and towards the edge of developments which are clearly not sustainable with Chalfont St Peter having no railway station or adequate bus service. There are absolutely no robust exceptional circumstances which justify the removal of the two Chalfont St Peter preferred options from the Green Belt. Simply adopting a new Local Plan or a perceived housing need are not in themselves exceptional circumstances.

The Green Belt Exceptional Circumstances Report prepared by Chiltern and South Bucks in May 2019 is on any common-sense read a very poor piece of work indeed. It discusses and then dismisses the importance of the Green Belt in general and in relation to the specific sites in Chalfont St Peter. It is not generally true that the Green Belt alone constrains the opportunities to meet local housing need. There are numerous Brownfield and some weakly performing Green Belt sites which could be used and in any event much of the Green Belt is so designated for a good reason— it is unsuitable for development for numerous reasons not just its Green Belt designation. Had CDC taken an unbiased and sensible approach to site selection, its arguments in this regard would have been strengthened. It is clear that Green Belt boundaries should only be altered in exceptional circumstances. The NPPF sets out a number of requirements which must be demonstrated prior to Green Belt land being released and in particular CDC’s strategy and plan must, inter alia, (a) make as much use as possible of a suitable Brownfield site and underutilised land and (b) optimise the density of development in town and city centres and other locations served by public transport. Crucially and importantly, in addition the NPPF emphasises the need to promote sustainable patterns of development.

It is not, and has never been established that the mere requirement to build houses constitutes an exceptional circumstance to justify the removal of land from the Green Belt. This is a fundamental point which has been ignored and/or not demonstrated by CDC which prima facie makes the Local Plan fundamentally unsound. In addition there is a requirement to provide employment land. The removal of the ES site (as defined below) constitutes a loss of valuable employment land and the removal of the Winkers site and associated development will cause a loss of the Paccar Scout Camp, an important international and local amenity. A significant number of jobs as well as the loss of valuable employment land will be caused by CDC’s actions.
Soundness, cont
Of further concern is the fact that the original Green Belt assessments carried out by Arup in 2016 were poorly scored, showing an inconsistent if not biased approach to scoring and providing no justification or evidence for its assessments. Indeed there are numerous areas appearing in the original Arup document which scored far lower than the two sites allocated for removal from the Green Belt in Chalfont St Peter yet there is no justification shown for them not being included or considered in any sensible way for removal from the Green Belt. Accordingly the Green Belt assessments are themselves fundamentally unsound. For example using the numbering in the original Arup assessment and for the moment accepting their biased scoring, general area 69 scores 7 out of 20, general area 65A scores 5 out of 20, general area 38B scores 9 out of 20, general area 57B scores 8 out of 20, general area 57A scores 6 out of 20 and general area 63 scores 7 out of 20. All of these areas scored lower than the ES Site mentioned below yet for some reason have not been seriously considered for removal from the Green Belt. I am sure that CDC will say there are other reasons for this but that those reasons are not apparent from the evidence base and have not properly been demonstrated. This is an area that the inspector should look at carefully as it demonstrates a failure of the evidence base and demonstrates further the unsoundness of the Local Plan.

Epilepsy Society Site – Area SPBP7

It is clear that there is no case for removing the Epilepsy Society Site (“ES Site”) from the protection of the Green Belt. We explain the reasons below.

It is clear that in selecting the ES site, CDC has already decided that it wants to release this parcel of land from the Green Belt and has approached the scoring of the Green Belt assessment as to whether or not the ES site should be removed from the Green Belt in a biased and inconsistent manner. This is partly based on a number of errors in the original Part 1 assessment prepared by Arup in 2016 which again showed bias and inconsistency and that bias and inconsistency is the hallmark of every assessment since.

The ES Site earmarked for development has very little built form, probably less than 30% in total of the entire ES site and as a whole is about 70% unbuilt open countryside which connects seamlessly with the wider open countryside.

As mentioned above, the scoring of the various Green Belt sites is unsound.

In fact – there is a very strong defensible boundary already around the whole ES Site – the roads!!
There is no case for artificially altering that boundary.

As is apparent the NPPF includes five principal purposes of the Green Belt. If an unbiased assessment of these five purposes is carried out in relation to the ES site it will be seen as scoring highly and the assessment CDC’s has used in the Part 2 assessments are biased and simply wrong.

Let us examine the Green Belt purpose assessments of the ES site.

Purpose 1 - It is clearly restricting the sprawl of large built up areas. It adjoins the Colne Valley Regional Park with ancient woodland nearby and is indeed connected to a large built up area in Chalfont St Peter and provides an essential buffer between Chalfont St Peter, Newlands Park,
Chalfont St Giles and Horn Hill and stops these settlements merging into one. It is a contiguous site as a whole with these settlements, and there is no justification for sub-dividing the land to shave some off suggesting it would not really matter. It would. CDC has rejected this approval with other areas, but seeks to do it here! Clear bias and inconsistency.

For example, site 23, north of high street Amersham is scored a 3+ for this purpose on the grounds removal would harm the historic core of Old Amersham. Yet, here, the historic core of the ES Site is the Colony itself (see below for heritage and historic values). Accordingly, the existing listed buildings and historic core of the ES Site needs protection also. So apply the test on the same basis as the Old Amersham site, and a 3+ is evident. The scoring is too subjective.

Accordingly there is no justification for scoring 3 particularly when compared to other areas. In our view, when unbiased criteria are applied, this should score a 3+ or 4 out of 5.

Purpose 2 – CDC admits the ES site does provide a wider gap between Chalfont St Peter and Chalfont St Giles (and Newland Park) and also the neighbouring settlements of Horn Hill and prevent them merging into one another. Again clear evidence of inconsistency is apparent. Area 40(b), area west of Denham Green, scores a 1 for this purpose, and overall scores only 4 out of 20. Yet CDC has concluded “the sub area scores moderately against one or more Green Belt Purpose(s) and therefore exceptional circumstances are not identified”. Clearly this site scores lower than the ES Site so that blows apart the argument that the lowest performing sites only have been selected for removal. Applied consistently, the ES Site cannot demonstrate exceptional circumstances for removal on this same basis.

The same argument is true of site 65(a) area within Tatling End. This scores a 5 in total, yet again, CDC concludes exceptional circumstances do not apply as it would create a “hole” in the Green Belt and “narrow the gap between Tatling End and Gerrards Cross and Higher Denham”. Again, this is undoubtedly true of the ES Site. On the same consistent approach, the ES Site if removed even in part, would cause of narrowing of the gap and a “hole” in the Green Belt. The biased and inconsistent approach is staggering.

Accordingly Purpose 2 should score 3+ or 4 or 5 out of 5 (incidentally why are no areas scored 4?)

Purpose 3 – The ES site adjoins the Colne Valley Regional Park. The part outside the built up ES Site is indeed very rural in nature and indeed the entire ES site is semi rural and has been performing as a site for centuries. In our view this should score 3+ or 4 out of 5.

Purpose 4 – The score of 0 here is nonsense. First CDC is ignoring the 4 listed buildings on the site. If they do not have historic value why are they listed? Development would clearly harm their settings in breach of the NPPF. Second CDC has deliberately and inexplicably ignored and not even mentioned the Buckinghamshire and Milton Keynes Historic Towns Project 2014 (“BMHT”) and the Chalfont St Peter Buckinghamshire Historic Towns Assessment 2011 which illustrate the important historical character of the Epilepsy Site as the Chalfont Colony. The BMHT sets out on page 37 that the Chalfont Colony has a “high” heritage value. The area is assessed in the Chalfont St Peter Historical Assessment as zone 13 and denotes that this area achieves a high score for the three criteria evidential of historical and communal values and a medium score for aesthetic values. The report goes on to state quite clearly that “given the historic importance of the Chalfont Colony, the buildings have the potential to be a conservation area in its own right”. The ES Site is clearly itself of historical importance being established on that site in 1894. This means it has an historical core all of its own – the core is the built up area given its historical value. Accordingly this should score surely 5 out of 5 and not 0 so there is absolutely no justification for the inconsistency CDC is exhibiting in this scoring. It is hard to think of a more “historic” core single purpose built settlement in the Chiltern District in any event. It is an historic colony in its own right.

CDC’s own sustainability principles are concerned with protecting the district’s historic and heritage assets!! Yet more inconsistency and bias in evidence.
Accordingly this parcel of land as a whole and even including the smaller site CDC is trying to carve out would score somewhere in excess of 16 out of 20 which makes it a very highly performing piece of Green Belt – indeed one of the highest scoring sites in the entire district. On that evidence, there are simply no exceptional circumstances that justify removal.

Accordingly, this is highly performing Green Belt. Contrast this with CDC’s own statement that “weakly performing Green Belt purpose alone is not considered a justifiable exceptional circumstance for removal from the Green Belt.” Areas which score less are still retained in the Green Belt. That should be the end of the matter.

CDC’s proposal is clearly contrary to NPPF paragraph 83 where “Councils should consider Green Belt boundaries having regard to their intended purposes in the long term, so they should be capable of enduring beyond the plan periods”. Once CDC establishes this precedent for shaving off parts of the Green Belt others will follow. This is a very dangerous precedent and actually weakens the Green Belt boundary rather than strengthens it. Within the site itself which was previously a Major Developed Site (“MDS”) in the Green Belt there are plenty of green open spaces, plenty of important views towards the countryside, much evident biodiversity, sport and recreation facilities and a general openness. Even though this is partly developed land it is highly performing land. It performs well on the Green Belt purposes in its developed state as well. Removing it from the Green Belt would open up the entire land to redevelopment and all of these advantages would be lost at a stroke.

In particular the Inspector in relation to the adopted Core Strategy concluded that this site should remain designated within the Green Belt. The Inspector was keen to ensure the existing degree of openness is retained. Indeed in CDC’s own major development sites paper in 2010 CDC was keen to draw the MDS boundary tightly to provide an important context for further redevelopment. Nothing here has changed and CDC has not set out in any way why these reasons should change. Remember that the requirement for a new Local Plan does not of itself justify exceptional circumstances or should not of itself change any of these previous conclusions. The release of land from the Green Belt in the manner proposed goes against previous planning decisions’ attempts to recognise the character of the land and establish an enduring boundary. In particular when Audley was granted its original planning permission, it was on the basis that the boundaries will be enhanced through the planting of trees and the Case Officer explained that this development would lead to a softer urban edge related to a natural environment which would help achieve one of the recognised benefits of the Green Belt. Any release of any part of this site from the Green Belt would harm the likelihood of these boundaries enduring beyond the plan period. The essential characteristics of the ES site are its openness and permanence and the site has already supported appropriate further development opportunities and continues to do so. Retaining the site in the Green Belt would continue to allow sustainable opportunities for redevelopment within the existing developed area as has been the case already.

Turning to the May 2019 Green Belt Exceptional Circumstances Report it is apparent as set out above that it fails to show exceptional circumstances. Area SPBP7 performs highly against Green Belt purposes. It’s not true to say that the majority of Green Belt area SPBP7 does little to promote wider Green Belt objectives as it comprises built form. The built form is a small part only of the parcel of land. It makes a significant contribution to wider Green Belt objective as it has clear visual amenity and enhanced landscape in the northeast portion. Indeed the developments carried out by Audley and Porthaven under the constraints of the Green Belt and including the new stage of development by Audley, have all been done in a sympathetic manner in accordance with the Green Belt development principles and have retained the character of the development as well as its softer edge. The Green Belt has not stopped or prevented this development from coming forward. Indeed it has ensured that the high quality development has been achieved. This would absolutely not be the case where the area is removed from the Green Belt protection, see for example the lamentable Holy Cross development in Chalfont St Peter which is one of the worst examples of town planning surely seen in the District and another legacy of CDC’s general incompetence in planning matters.
There is already a strong defensible boundary around the ES site which is the existing roads. It is true you could just about construct a boundary but that is artificial and unlikely to be permanent. The simple fact is there’s no need to alter the boundary around this site and it’s illogical to do so.

Any development in this site of the densities suggested by CDC would cause irreparable harm to the Green Belt and significant loss of amenity on numerous counts.

The site makes a significant contribution to maintaining separation (Purpose 2) and performs strongly in safeguarding the countryside from encroachments (Purpose 3) and further indeed contributes to the setting and special character of the historic town, e.g. the colony itself (Purpose 4) and makes a significant contribution to the wider Green Belt through visual amenity and enhanced landscape. It is incorrect to state that development would allow the modernisation of the leading Epilepsy facilities on the site. It is apparent that the Epilepsy Society would simply cash in, sell up or move. This is yet another fundamental misconception in the Local Plan.

The conclusion is unjustified and incoherent. It is completely untrue to describe the site as “a highly sustainable location”. It is on the edge of the village and it’s inherently unsustainable (see below). This statement is absolute nonsense. Clearly and as is apparent from CDC’s own report exceptional circumstances do not exist for release of this site from the Green Belt.

The Sustainability Development Criteria Assessment is again biased. The land is simply not sustainable. It clearly will have, if it were developed, an adverse impact on natural resources because the site is in the middle of a safeguarded area and it would certainly have a moderate to major adverse impact on landscape given its proximity to the Colne Valley Regional Park and ancient woodland and in our view it would have a significant impact on waste given the problems that we clearly have in Chalfont St Peter with the sewerage system and the drainage. It would also impact the economy because it is currently providing much local employment both in its C2 use and the other businesses that are located on the site.

It would clearly in terms of development have an adverse impact on pollution, cultural heritage and climate change. As a whole development of this site much beyond its current built footprint would have a harmful effect on almost every aspect of amenity in the Chalfont St Peter locality.

It is abundantly clear that overall exceptional circumstances cannot apply for the removal of any part of the ES Site from the Green Belt. What is important to note is that as a site it is a high performing site as it is. In short if it ain’t broke don’t fix it. The ES Site currently performs well for the Epilepsy Society, as there are important medical and research facilities which the ES society utilises on that site. In addition there are two highly performing and very well developed care homes on that site, both of which have been developed in accordance with the Green Belt principles and both of which are excellent and high performing developments and Audley is building its third phase on the site at the moment. Gradually over time this land is being redeveloped and the Green Belt protection is ensuring the land is being developed in a sensible, sympathetic and intelligent way. To remove the Green Belt protection would potentially prevent such sympathetic development. There is no justification for building on the green fields that are part of the ES Site as they perform an important function adjoining the Colne Valley Park and close to ancient woodland.

Development is happening naturally and sympathetically on the site as it stands and as set out in the Chalfont St Peter Neighbourhood Plan the ES Site is an emerging centre for C2 use which obviously it must remain as such and is working very well. Why destroy something which is already in planning terms performing well?

In sustainability terms the current local infrastructure is currently insufficient to support development at the ES Site. It is clear that congestion will become a huge issue due to narrow and totally unsustainable roads which surround it. Over half the site is more than 400 metres from any bus stop and the bus services are irregular and not capable of supporting any community use. Any redevelopment of this site would feed the congestion on the A413 which is already significant at certain times throughout the day.
In fact it is impossible for residents of the ES site to walk to a local train station given the hills and distance. Surely development should be placed in the areas which are close to transport links? Some of the roads surrounding the ES site often have no space for two cars to pass and certainly with no street lighting and pavements for pedestrians, including children to walk to school, buses and so on. It would also be very difficult to extend these roads if not impossible so from a sustainability point of view the ES site is inherently unsustainable. The site (as is the Winkers site) is on the top of a hill and accordingly walking or cycling to Gerrards Cross station involves climbing two difficult hills on a round trip.

We do not understand how, as the Local Plan states, some improvement to the road junctions at the A413 is possible, or would even work, as the junctions are still served by the same narrow and unsuitable roads, so all this would achieve is move the bottleneck further. Developments of this size on the two CSP sites would require a complete road redevelopment on all adjoining roads—something simply not possible. It is manifest that the local infrastructure cannot be improved to support development of this scale; in these sites. Unlike for example the potential development of Raylands Farm in Gerrards Cross which could open directly onto the A40 and which is within walking distance of Gerrards Cross railway station!

It is further noted that sustainable distances to facilities and amenities are set at local park/green space minimum 400 metres maximum 600 metres, leisure centre 1.5km minimum and 2km maximum, Doctor’s surgery 800 metres minimum and maximum 1km, hospital minimum 5km maximum 8km. The ES site fails to achieve all but the first of these targets by some distance. The nearest hospital to Chalfont St Peter is in Amersham some 9.7km away and that has no A&E facility. The site is well over 2km from the nearest Doctors surgery.

The agricultural land on the ES site is high grade and among the best and most valuable agricultural land in the District. Any loss of Green Belt status of the adjoining land would threaten that important agricultural land.

Of further importance to the ES site in terms of sustainability is that it is currently employment land. It is a properly functioning employment site. The Care Homes and the Epilepsy Society itself provide much local employment and there are several small businesses within the Epilepsy Society Site which provide further employment.

The Epilepsy Site is the home of the National Epilepsy Society which is a world renowned centre for research and development and managing curing epilepsy. Currently there are important recreational facilities on the site as well with 9 football pitches plus a pavilion with toilet, showers and changing facilities which are used by more than 24 teams. It is a significant employment site within Chalfont St Peter currently with planning designation C2 it is clear in any event the current planning designation should remain for all parts of the site to protect its existing community use. On the ES site itself businesses present include, Gordon Summerville, Fineland Forestry, CDM Autos as well as farm use and recreational use (Chalfont Saints football).

The Audley Homes developments and the Porthaven development on this site are excellent and should further be complemented by further medical use or assisted living to retain the site for employment, possibly with some limited key worker housing to support such use. There should be no general housing on this site at all. The Chalfont St Peter Neighbourhood Plan should be adhered to considering the Neighbourhood Plan itself has been adopted by referendum and is therefore supported by local residents. The built part of the ES site is an ideal site to provide further care home and medical facilities for Chalfont St Peter. It must remain within C2 use as provided for in the Neighbourhood Plan, with Green Belt status intact.

It is a ridiculous argument to suggest that the removal of the ES site from the Green Belt would help the prospect of future attempts to modernise the site which might otherwise comprise inappropriate development in the Green Belt. The comment from the CDC that "the Neighbourhood Plan supports the continued uses of the site and its modernisation which could require development that would be
inappropriate from the Green Belt. Removal from the Green Belt would help support the Chalfont St Peter Neighbourhood Plan is absolute nonsense!!

There is no support or justification for this approach in the definition of exceptional circumstances in legislation or guidance. The Chalfont St Peter Neighbourhood Plan does not envisage or require any change of designation of the Green Belt on the site in fact the very opposite. It recognises quite clearly that successful development can be achieved and is being achieved within the policy framework of the adopted Core Strategy and it is nonsense to suggest that the site needs to be removed from the Green Belt to support the Neighbourhood Plan. Quite the opposite.

It is clear therefore that C2 use must remain for the entirety of the ES site. There can be no dilution of this. It is a worry that the Holy Cross site was currently designated for educational use yet CDC inexplicably removed that site from such use causing significant damage to residents of Chalfont St Peter so we do fear that even if a C2 use is designated to this site there is no guarantee that CDC will have the good grace to maintain it. It is however vital that this site as a whole retains C2 use. To lose even any part of this from such use would be inconceivable as nowhere else in Chalfont St Peter does such an area exist which could fulfil such community needs in such an important way. Indeed allied to the previous argument about sustainability if the highest concentration of care homes were built together on the ES site and it remained in the C2 designation in the Green Belt, given the concentration of such homes there is more chance of a sustainable bus service and other sustainable facilities being provided to support those residents with their specific needs. It seems to us that this should be a centre of excellence for such facilities and appropriate infrastructure as sustainable facilities could be more easily and specifically provided to support that C2 use and, in doing this there is still no reason to remove it from the Green Belt at all.

In addition the current care home developments (and the next stage which is already under development) provide accommodation for the elderly and infirm and effectively releases their existing housing to be available to others who wish to live in the area. Any housing on this site should be key worker or elderly residents only. There is no justification for any general housing on this site as there are many more appropriate sites for general housing in the district.

If Green Belt status were removed and residential accommodation allowed the land price would rise too high for care or community developments in the future on this site and high density housing would take over. We understand that the current land value of the ES Site outside the Green Belt is around £15,000 per acre; if it loses Green Belt status the value would approach £1,500,000 per acre. An amazing windfall for the Epilepsy Society! This would leave no developable land in Chalfont St Peter for other future community needs. The Holy Cross site has already been lost for community educational use and the ES site must remain for future community needs such as C2 or possibly education and leisure to support the inevitable building of more houses elsewhere in the area in the longer term.

The current developments including the new developments by Audley and Porthaven have been successfully built on the existing footprint. They have maintained the community care ethos as well as preserving the original open natural style of the site. Their developments can continue on this basis without the need to remove Green Belt status.

CDC provides no justification whatsoever for the number of houses earmarked for this site. The site should remain in situ use which would encourage the Epilepsy Society to remain on this site. There is no justification for the housing allocation suggested by CDC which of itself is a significantly higher density than the surrounding houses in the immediate locality and Chalfont St Peter as a whole. 140 affordable homes on that site are clearly unsustainable. It is impossible to get to the site otherwise than by car. Surely affordable housing should be placed in locations nearest to employment and transport?

One further concern is that there are actually vulnerable elderly adults on the ES site, at the ES homes, the Porthaven care home (dementia) and at Audley as well. The proposals for this site would constitute a
significant loss of their amenity to say the least, and potentially if not actually, their homes as well. Surely CDC has a duty to protect its vulnerable residents?

**Winkers Field – SPBP8**

Many of the comments made above in relation to the ES Site are relevant again to this site so we will not repeat them here.

It is important to note that this site adjoins the Paccar Scout Camp and land known as the scout field. This is a nationally important site much used by scouts and other youth groups as well as wider groups and any removal of this site from the Green Belt would do immense harm to the viability of such site. Indeed any housing on this development would threaten the viability and existence of the adjoining site as a safe place for children to camp, explore woodlands and so on. In short it would destroy the existing Paccar scout camp and its business. The impact assessment prepared by the Paccar camp is compelling in this regard.

Indeed, please note the conclusion of the Independent Impact Assessment:-

"The resulting conclusion is that if the land under Option 8 were to be released from the Green Belt it would result in the closure of the PACCAR Scout Camp".

In any event illogical criteria has been selected by CDC to calculate development of the scale of some 200 dwellings on this site which is completely out of keeping with the surrounding housing density.

Development of this site will cause a loss of amenity for the residents of Chalfont Heights and the many tens of thousands of people who use the adjoining Scout Camp. The Scout Camp would most likely close.

The Chalfont Heights Estate has been designated and established a residency area of special character by CDC. This designated state is derived from not only the architecture itself and its rural setting, but also from the fact that the estate is bounded by Green Belt and by Gerrards Cross golf course.

All the arguments for the sustainability made in relation to the ES site are relevant here. The site is a considerable distance from any bus or train service. Any development on this site will be unsustainable and the road network is unable to sustain any increase in traffic of this scale.

The Chalfont St Peter Neighbourhood Plan seeks to retain the community use of this facility in particular relation to the Paccar scout camp. Any development is in breach of the policies of the Neighbourhood Plan which CDC intends to support in relation to the ES site! Again much evidence of inconsistency.

Again there are no exceptional circumstances to justify the removal of the Winkers site from the Green Belt.

In conclusion, there are no exceptional circumstances at all to remove either of the CSP Sites from the protection of the Green Belt. There can be no other legitimate conclusion.

It is clear that on this basis the Local Plan is unsound and should be rejected. CDC has obviously not properly considered the numerous other locations in the District which are both deliverable and more appropriate for development — e.g. Raylands farm in Gerrards Cross — arguably the most sustainable area for development in the district and supported by a railway station, but completely immune from development? It is nothing short of scandalous.

Further there is no evidence that previously utilised or brownfield land has been properly considered for development prior to the proposed Green Belt releases. Where is the evidence of this?

Is there any evidence that CDC has complied with its duty to co-operate – eg with Slough? We do not believe it has done so.
Are you proposing any modifications to strengthen the Plan's ability meet this test of soundness?

Yes ☒  No ☐

Please specify how you would modify this policy to improve its alignment to this test of soundness.

Areas SPBP7, Chalfont St Peter, North East Epilepsy Society and SPBP8 Chalfont St Peter South East Winkers Field should be removed from the plan as building places and retained in the Green Belt.

Additional land areas could be included to replace these areas such as, land west of the A413, Chalfont St Peter, Gerrards Cross, RGA6/1.12. This particular site is regarded by CDC as performing moderately against the Green Belt purpose 3 and weakly against purposes 1, 2 and 4. On this basis, it scores lower than the assessment on the Epilepsy Society site. Given the more sustainable location, it is likely that this site would be a better site selection. CDC, as in common with many sites, has inconsistently and improperly rejected this site. Further alternative site are for the Chalfont St Peter site assessments in 2016, site CD0044, Parkwood Park North, Maltman’s Lane; CD0044 Parkwood Farm South, Oxford Road; and CDC0033 Raylands Farm, Bull Lane. All of these sites are inherently sustainable, could easily adjoin the A40 requiring minimal amendments to infrastructure and would provide significant development opportunities. For some reason, these sites have simply been rejected by Chiltern District Council although the Raylands Farm site is potentially available for development. See www.richboroughestates.co.uk for proposed site development at Chantry Park.

CDC needs to show it has considered all available brownfield and previously utilised land prior to any Green Belt release eg the old Slough Football Club. CDC need to prove it has co-operated fully with Slough and adjoining councils.

CDC needs to justify the housing numbers it aspires to provide. Where is the justification for these numbers?
Duty to Co-operate

Do you consider the Local Plan to have met the requirements of the Duty to Co-operate in accordance with section 110 of Localism Act 2011 and section 33A of the Planning and Compulsory Purchase Act 2004?

Please note: any non-compliance with the Duty to Co-operate is incapable of modification at examination

Yes □  No ☒

Please give details of why you consider the Local Plan has met/not met the requirements of the Duty to Co-operate.

It is not apparent that a duty to cooperate has been properly carried out. It would appear that Aylesbury Vale would be prepared to take a greater housing allocation than that which has been agreed and initially first muted by CDC. In addition, the extension of Slough towards Gerrards Cross, put forward by Slough Council appears to have been rebuffed without proper discussion and there is no evidence to confirm that the duty to cooperate has been complied with. Development in the South Bucks area towards Slough would appear the most logical, yet again this does not appear to have been properly examined by Chiltern District Council.

There is no evidence that CDC has complied with its obligations.
Part D - Attendance at the EiP

If your representation is proposing a modification(s), do you consider is necessary to participate at the examination in public?

Please note attendance at the examination in public is at the discretion of the appointed inspector

Yes ☒ No ☐

If you wish to participate at the examination in public, please outline why you consider this to be necessary (please be as precise and succinct as possible)

We write on behalf of SENSE a local action group formed in Chalfont St Peter ("CSP") over fourteen years ago to assist local residents in dealing with village threatening planning matters. We are a volunteer-run organisation, our website is available at www.sense4csp.org and currently we have over 1,000 Chalfont St Peter households on our mailing list. We have extensive and detailed local knowledge of the village and its surrounding areas, engaged a barrister to represent us at the planning enquiry into the original proposed housing application by the Epilepsy Society in 2005 and have submitted numerous submissions to Chiltern District Council ("CDC") over the years. We have also, in conjunction with Chalfont St Peter Parish Council ("CSPPC"), recently held a further meeting in Chalfont St Peter to discuss the Local Plan proposals with the meeting being attended by over 200 people.

Representatives of SENSE (including the principal author of this submission) are part of a joint working party with CSPCC formed to respond to the Local Plan on an ongoing basis. This response has been discussed in part in a public open meeting on 26 June 2019 in Chalfont St Peter attended by 200 people and has been approved by the SENSE committee.

We feel it would be right to discuss our concerns with the Inspector as throughout this entire process over the last three years and several consultations on the Local Plan prior to this current limited examination, at no time has Chiltern District Council engaged with us or been prepared to discuss our objections or, it would seem, be prepared to take anything we have suggested into account. There has been no effective consultation. It is true that numerous planning officers, heads of planning and so on at Chiltern District Council come and go and it appears to be staffed largely by outside contractors with little or no knowledge of the district itself, which surely has not helped this quite frankly appalling process which Chiltern District Council has engineered, but the failure to engage with local residents on any meaningful level is shocking. We have some serious concerns about the way this Plan has been inconsistently prepared with some quite frankly inexplicable decisions being taken forward. The preparation of the Plan at this stage has been so rushed that we understand the District Councillors have not had a proper opportunity to review. Given this Plan is supposed to last until 2036, poor decisions made now will have a significant effect over the next 17 years and will be impossible to overturn. We feel it is right and proper for us to make our points to an inspector as the inspector needs to understand the strength of feeling against some of what is proposed.
Part D Supporting Information

If you wish to attach any formal evidence, maps or PDFs please ensure they are clearly marked with the Policy-Level number where required.

Part E – Data Protection and Signature

In submitting comments to this consultation we are required, under the Town and Country Planning (Local Planning) (England) Regulations 2012, to notify you when the independent examination will take place. We will use the contact details you have provided to do this.

Please note: at the end of the consultation period all comments will be made public and will be submitted to the Secretary of State along with the Local Plan and other relevant supporting documents. Your comments and name will be published but other personal information will remain confidential.

Your comments will be reviewed by the independent Planning Inspector appointed by the Secretary of State to carry out the Examination in Public. You may be invited to discuss your comments at the Examination in Public at the discretion of the Inspector.

In line with General Data Protection Regulations (2018), your details are stored on a secure system and are used only for the purposes of consultation for the Local Plan and associated documents.

Your details will be stored until such a time that the Local Plan has been adopted. If you do not wish to receive further updates from the Council in relation to the Local Plan, please email us.

Please tick below to indicate you have read this notice. ☒
B: Tests of Soundness at Policy Level

Policy Number: 

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared please explain why

CSP Parish Council will respond to the policies. We support their responses.

Cont./