EPILEPSY SOCIETY SITE

The requirement is to show “exceptional circumstances for removal of land from the Green Belt”. CDC has prepared a Green Belt Exceptional Circumstances report as part of the Local Plan. In my view, it is a very poor piece of work indeed. The National Planning Policy Framework (“NPFF”) sets out a number of requirements which must be demonstrated prior to Green Belt land being released as part of a Local Plan which plan must make as much use as possible of suitable brownfield sites and underutilised land and optimise the density of development in town and city centres and other locations served by public transport. Crucially, the NPFF emphasises the need to promote sustainable patterns of development. It 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.

The current Green Belt assessment is based on earlier assessments made by Arup in 2016 whereby a number of parcels of land were scored in relation to their performance against the functions of the Green Belt. The scoring adopted by Arup was inconsistent, biased and subjective and often based on inaccurate and incomplete evidence. Indeed, there are numerous areas appearing in this document which scored far lower in the Green Belt assessment than either the Epilepsy Society site or the Winkers site. In particular there are nine such sites which are immediately apparent including a site within Tatling End for example where CDC concludes that exceptional circumstances would 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”. CDC also concludes that “weakly performing Green Belt purpose alone is not considered a justifiable exceptional circumstance for removal from the Green Belt.

Apply this then to the Epilepsy Society site. The areas I have just mentioned are retained within the Green Belt yet for some reason the Epilepsy Society site is capable of being removed from it? This is plainly not objective or correct.

If we examine the purposes of the Green Belt and apply it to the Epilepsy Society site then

Purpose 1 – does it restrict the sprawl of large built up areas. Of course it does it provides an essential buffer between Chalfont St Peter, Newlands Park, Chalfont St Giles and Horn Hill and stops these settlements from merging into one.

Purpose 2 - to prevent neighbouring towns from merging. Again it clearly does this.

Purpose 3 – assist in safeguarding the countryside from encroachment. Again it clearly does this - it adjoins the Colne Valley Regional Park. The majority of the site is very rural in nature and adjoins ancient woodland.

Purpose 4 – to preserve the setting and special character of historic towns. CDC says it does not fulfil this purpose. Arguably this is nonsense. There are four listed buildings on the site so if they do not have historic value why are they listed? CDC has also deliberately ignored the Buckinghamshire and Milton Keynes Historic Towns Project 2014 which says that the Chalfont Colony has a “high” heritage value and states that “given the historic importance of the Chalfont Colony, the buildings have the potential to be a conservation area in its own right”.

Accordingly this is highly performing Green Belt and on any unbiased assessment there exists no exceptional circumstance to remove this land from the Green Belt. This alone makes the entire Local Plan unsound as it shows an unsound basis for selection of the development sites.

Of major importance is the fact that any Green Belt boundary has to be strong and defensible. Let’s take a look at the Green Belt boundary here. Currently it is very strong – it’s actually the roads. CDC’s suggestion is for something which is very weak and not permanent, leading to further and further encroachment of the Green Belt. It is simply indefensible.

Incidentally, the Epilepsy Society is arguing and will challenge of the soundness of the Local Plan on the basis that it does not release enough land from its site for development. If the Epilepsy Society is successful in persuading the Inspector of its case we will potentially have a total of 948 dwellings on the Epilepsy Society site not 360 and the built site will encroach without any regard for sustainability or a defensible Green Belt boundary to extend as far as Newlands Park and Hornhill and leave the entire NSE site liable for release from the Green Belt. There is nothing that we can do about this at the moment as it is not part of the Local Plan but in my view it could have a catastrophic effect on our village, far worse that we are currently contemplating. And it would probably cause further and further development without any strong Green Belt boundary to prevent it.

In addition the Epilepsy Society site is performing well as a Green Belt site in terms of development. We have already had the three excellent developments with Audley and Porthaven all within the constraints of the Green Belt. Good development is still very possible within the Green Belt. Had the site been removed from the Green Belt we would no doubt be looking at another Holy Cross rather than Audley or Porthaven. If it ain’t broke don’t fix it.

The Neighbourhood Plan for Chalfont St Peter designated this site as C2 for healthcare and allied developments. This was approved by a local referendum yet CDC has chosen to override and ignore this.

Finally, sustainability. This site is simply not sustainable. The roads cannot take the extra traffic and frankly the junctions with the A413 appear very difficult to improve to the extent required. You cannot walk anywhere from the Epilepsy Society site to any regular public transport, every journey will be by car and as you know it is miles from a railway or a tube station. There is plenty of other land whether or not in the Green Belt closer to Gerrards Cross for example which is much more sustainable and could provide hundreds more houses yet CDC has chosen to ignore this eg Raylands Farm (see www.richboroughstates.co.uk).

This is simply unsound. The Local Plan is unsound, as the two sites in Chalfont St Peter CDC has selected for removal from the Green Belt have been incorrectly selected based on a biased and flawed assessment. The Epilepsy Society site currently has a very strong definable Green Belt boundary. The suggested new boundary is simply weak and indefensible. And it is inherently unsustainable.

The Local Plan can be made sound by the removal of the Epilepsy Society site and the Winkers site from the Building Places. They should remain in the Green Belt.
CDC says the site performs “weakly” as Green Belt. We disagree for largely many of the reasons I have discussed earlier. Again the boundaries suggested are weak and largely indefensible. Again it is barely sustainable and still requiring regular car use to get to any public transport, or to local amenities.

Crucially, it will lead to the closure of the Paccar Scout Camp.

Note the Executive Summary from the Paccar Scout Camp’s independent assessment report.

“Planning Solutions Consulting Ltd (PSC) were commissioned to produce a report on potential risks to PACCAR Scout Camp due to their experience and expertise in the tourism, leisure and recreation sector, including activity centres. PSC is a specialist leisure and tourism consultancy with direct commercial experience in the sector. This report has been produced as a result of extensive research and industry comparisons in line with the aforementioned expertise.

The report has looked at the impact of removing the land adjacent to PACCAR Scout Camp from the green belt and any resulting development. In this instance the assumption was based on the land being developed for residential dwellings.

The report has canvassed opinion from a wide range of parties, users of PACCAR Scout Camp both past and present, industry experts and Managers and Chairmen of similar Centres.

In compiling our report, we have also carried out extensive financial research, and amassed a large amount of data which is factual rather than based on ‘opinions’ or ‘assumptions.’

The evidence contained in the report concludes that the current risks to the operation of PACCAR and to its visitors is at an acceptable level. With a residential development on the land adjacent, the usage of the site will decline (as confirmed within the primary research) and the risk rises to an unacceptable and unsustainable level. The site will become unviable in a short space of time and would face the inevitability of closure.

PACCAR Scout camp is a charity, it is a volunteer run centre (with over 130 regular volunteers the majority of whom give one weekend a month) and services the Youth Sector, mainly Scouts and Guides. It relies on its secluded nature and it is that which is the main factor in its success and longevity (it has been operating since 1938).

The risk from safeguarding issues of introducing a residential development close by is too great: the lack of privacy, increased risk of trespass, theft, vandalism, and unauthorised access to the centres’ adventurous activities such as climbing walls and zipwires would be too much for the Centre to withstand.

Referred to in the report and appendices are examples of other centres that have failed when housing has grown alongside them. The report also contains detailed financial data showing how a modest drop in visitor numbers will make the site unviable.

Given the high fixed cost base this will signify that the whole centre will become a lossmaking concern with a trading deficit and no potential funds to allocate to ongoing improvements, refurbishments and new capital programmes. Ultimately this completely changes the whole operation into a non-viable entity which could not support such losses over a sustained period.
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 PACCAR Scout Camp."

Again this is simply not **sound**.