

Chiltern and South Bucks Local Plan Green Belt Preferred Options Consultation Response Form



Stronger in partnership

This is **your** chance to provide your views on the **15 Preferred Green Belt Options** listed in the Consultation Document. Please do not limit your comments to these 15 options, this consultation also provides the opportunity for you to comment on the evidence base documents, other Local Plan matters, and to suggest other options.

This form has **two parts**:

PART A - respondent (your) details, **only your name will be published** (at this stage you may wish to remain anonymous); and

PART B - for comments, **which may be made publically available** following the close of the consultation. If needed continue your comments on separate sheets.

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

This form is also accompanied by an Equality Monitoring Form. Individual data collected from this Monitoring Form will remain confidential with only summary results being published.

Please return your completed forms to one of the addresses/emails below:

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

planningpolicy@chiltern.gov.uk

or

ldf@southbucks.gov.uk

**PLEASE NOTE: YOU ONLY NEED TO EMAIL YOUR
RESPONSE TO ONE OF THE ABOVE EMAIL ADDRESSES**

All Consultation Responses must be received by 5 pm on 12th December 2016*.

* The Consultation deadline may be subject to extension – please check the websites (below) for more details.

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

The Consultation document and supporting evidence base are available on the Councils' websites:
www.chiltern.gov.uk/planning/localplan2014-2036 and www.southbucks.gov.uk/planning/localplan2014-2036

PART A – YOUR DETAILS**Are you:**

An Individual An Organisation Other (*please specify*)

Chenies Parish Council

Personal Details***Agent's Details (if applicable)**

**Title

**First Name

**Last Name

Job Title
(if on behalf of an organisation)

Organisation
(if applicable)

**Address

Telephone Number

**Email Address

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

***Name and either email or address required if you wish to be added to the consultation database (see below).*

Consultation Database (Mailing List)

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

Chiltern District Council and South Bucks District Council are the Data Controllers for the purposes of the Data Protection Act 1998. Individuals and organisations on the Planning Policy Consultation Database will only be contacted by the Councils in relation to the preparation and production of planning policy documents. The Councils will not publish the names of those individuals on the database but may publish names of statutory bodies and organisations at certain stages of the Local Plan process. Please indicate if you want to be added to the joint consultation database (tick box below). *Please note: you do not need to tick this box if you received a letter or email notification from the Councils prior to the start of the consultation, as you are already registered.*

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

PART B – RESPONSE

Green Belt Options – Please Provide your Comments

The Councils have concluded that land within the Green Belt will need to be released in order to contribute to meeting development needs to 2036. This is despite maximising opportunities on 'brownfield land' or sites within the built areas and on previously developed land in the Green Belt.

The Councils have identified **15 preferred options** for development in the Green Belt after taking account of views expressed in a consultation earlier this year and testing a full range of options. All of these preferred options if suitable for development will be needed to contribute to our development needs. They are 'preferred' options at this stage as work is on-going to test their suitability.

Further testing following this consultation will establish what infrastructure (e.g. highway improvements, schools, medical facilities etc.) will be needed to support the options moving forward taking into account current pressures and circumstances.

We are consulting on these 15 preferred options to:

- a) Seek views to help determine their suitability for development;
- b) Help understand views on what type of development should be sought if suitable and what type of requirements (other than infrastructure) should be secured as part of development;
- c) Enable comments on the draft technical work supporting the selection of the preferred options; and
- d) Provide the opportunity for alternative options to be put forward.

Evidence and background documents are available here: www.chiltern.gov.uk/planning/localplan2014-2036/evidence and www.southbucks.gov.uk/planning/localplan2014-2036/evidence.

When commenting please clearly indicate which preferred option(s) you are commenting on.

Please do not provide any personal information you do not want to be made publically available as these comments may be published at a later date.

Please see attached for the comments and opinions of Chenies Parish Council.

PART B – RESPONSE

Chenies Parish Council (CPC) believes it should not comment specifically upon the merits or demerits of any of the 15 preferred options since none of them are situated within its parish. CPC does however hold views in general terms:

- on land being removed from the Green Belt especially if also designated AONB
- on infrastructure issues especially with regard to sites in Little Chalfont and Chesham

and questions the HEDNA conclusion that 14,700 new dwellings are needed in Chiltern & South Bucks.

Removal of land from the Green Belt

We would strongly urge retention of the existing Green Belt and AONB. We would suggest these protective measures should override development needs, which of course was their original purpose.

We would make the obvious comment that there is no point in having 'needs' which are not capable of being delivered. We do not believe these needs amount to the exceptional circumstances required to make inroads into the Green Belt especially when this may also involve areas protected by the AONB.

Regarding Green Belt Options in general we quote an extract from the NPPF Planning Practice Guidance Notes which supports our view that land should not be taken out of the Green Belt to supply land for unmet housing needs:

"In decision taking, can unmet need for housing outweigh Green Belt Protection?"

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt."

We also quote from the Minister's letter of December 2014:

"Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement. They also need to consider whether there are opportunities to co-operate with neighbouring planning authorities to meet needs across housing market areas. Only after these considerations are complete will the council's approach be tested at examination by an Inspector. Clearly each council will need to work through this process to take account of particular local circumstances in responding to Strategic Housing Market Assessments."

In our view the Minister appears to be guiding Councils to take full account of existing Green Belt protection before completing their needs assessments ie again there is no point in having a housing requirement which cannot be delivered due to lack of land which can possibly be developed (ie land which is not Green Belt).

Infrastructure

CPC have serious concerns about the lack of infrastructure to support the existing level of development in the two districts. We appreciate that this consultation is designed to gather

comment upon the suitability of the 15 Preferred Options but before any of them can be brought forward as possible development sites much more detailed work will need to be completed on all aspects of infrastructure provision. Infrastructure as a whole should be properly planned, costed and in place prior to any development taking place.

Two of the Preferred Option Sites are of particular concern to CPC, namely No.1 North East of Chesham and No. 6 South East of Little Chalfont. Both of these sites would adversely affect Chenies Parish due to increased traffic. Water supply in the Chilterns is entirely taken from the aquifer. The present level of abstraction is causing unacceptable environmental damage to our chalk streams i.e. they frequently dry up. Another source of water will be needed to supply an increased population and this has not been planned for. Chesham Sewage Treatment Works is already working at capacity and storm water discharges of untreated effluent into the river Chess are still taking place. Thames Water are working on improvements to the treatment works but have no current plans to increase capacity. Broadband is inadequate in many locations. Schools, hospitals and GP surgeries are also under stress.

Needs Assessment

Regarding the Buckinghamshire Housing and Economic Development Needs Assessment Update DRAFT: 20 October 2016 prepared by Atkins, when discussing the percentage split of the overall housing need (at page 171) between the types of need (viz 20% affordable home ownership, 21% affordable rented and market housing 59%) the report goes on to comment: "Of course, this mix would still need to be considered in the context of economic viability for housing developments in the area". CPC is not at all sure that enough account has been taken of the economic viability of providing the 2,500 affordable homes requirement suggested for Chiltern and South Bucks. How are developers to be persuaded to offer such properties in such numbers and, even with some form of subsidy, how will these houses become 'affordable'? The greatest need appears to be for 3 bedroom plus housing. In the two districts currently the lowest price for a 3 bedroom semi-detached home is £375,000 (Chesham). Also bear in mind that the present Government Help to Buy initiative expires in 2021.

The Needs Assessment appears to take no account of the June 23rd Referendum which resulted in a vote to leave the European Union and the likelihood of a different policy towards immigration being adopted. There is a brief mention on page 78.

CPC would also make the point that the Needs Assessment does not establish that the housing need is affordable for those assessed as needing it. Chiltern and South Bucks are amongst the most expensive districts in the country outside London. People will move to locations where their housing and work requirements can be met at a price they can afford.

10 December 2016