



**Miss Gemma Payne
Planning Officer
Chiltern District Council
King George V Road
Amersham
Buckinghamshire
HP6 5AW**

14 October 2010

Dear Miss Payne,

**RE: Planning application Ref no CH/2010/0796/FA and CH/2010/0977/HB
Newland Park, Gorlands Lane, Chalfont St Giles, Bucks.**

SENSE4CSP acting on behalf of the residents of Chalfont St Peter wish to lodge our strongest objections to the proposals detailed within the above applications. The directives in Section 38 (6) of the 2004 Act along with other substantial material considerations, both singularly and collectively dictate that these applications be refused. We object to the applications on the following grounds:

Planning Policy

The Secretary of State for Communities and Local Government recently abolished the Regional Spatial Strategies and hence all justifications for such intrusive developments such as this should now fall away.

Further, these extensive proposals are clearly justified on emerging CDC policy, namely the much maligned Draft Core Strategy and its wholly deficient supportive evidence base. According to Section 38 (6) of the 2004 Act, the Planning Authority must consider the proposals against their Development Plan. However as part of Chiltern District's now defunct Local Plan this is now not possible. In this instance we must now refer to Para 18 of PPS1, where it tells us that the event of planning policy documents such as the Draft Core Strategy, being the subject of submission consultation and considerable local objection, accordingly cannot attribute any significant weight in the planning decision process.

Paragraph 18 of PPS1 states:

"Planning applications should continue to be considered in the light of current policies, however, account can also be taken of policies in emerging DPDs. The weight to be attached to such policies depends on the stage of preparation or review, increasing at successive stages reached"

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“Where a DPD has been submitted for examination but no representations have been made in respect of relevant policies, then considerable weight may be attached to those policies because of the strong possibility that they will be adopted. The converse may apply if there have been representations which oppose the policy”.

Bearing in mind these very clear and direct guidelines and the strong likelihood that CDC’s draft policies will undoubtedly be subject to significant amendment, it is clear that the District Council must now refer to the saved policies which seek to protect sites such as this from development. Despite being out of date they are the only policies that hold any weight. It would be blatantly undemocratic for CDC to make any premature decisions based on any of their ‘emergent policies’.

The letter sent by the Government Office for the South East states that the extension of saved policies as listed in the Direction does not imply that they would be sanctioned if presented to the Secretary of State as new policy. Further it makes clear that plan led systems are to be maintained for a continued stable planning framework with an emphasis on a sustainable supply of development land.

Conclusively development policy must continue to operate according to the plan led system. It must be noted that the Government Office for the South East clearly doesn’t indicate that the plan led system should have any reason whatsoever to disregard the Statutory Development Plan or any of its saved policies.

Policies are saved for this very reason: to halt excessive and poorly implemented plans that would otherwise blight our towns and villages. If central government wished our local authorities to have the power to abolish democratically implemented policies, then the Government Office would simply refer the council and applicants to emerging policies. Thankfully this is not the case and we, like Eric Pickles must rely on our Councils to take responsible decisions and abide by central and local planning policy.

The Local Plan specifically does not support residential development on the Newland Park site. Indeed there are strong policies within that resist any development at all on extensive areas of the site of which significantly the applicants propose to develop as part of their scheme.

Transportation and the Environment

The Newland Park application contravenes PPS3 and PPG13 which promote sustainable development in areas where good transport links would minimise the use of car travel.

The Newland Park site is extremely poorly served by transport links, indeed it is sited in a remote area where the road network exclusively comprises country lanes which narrow to single track in many places. The closest rail link is 2 miles away, with a minimal bus service. Indeed development on this scale, on a site like this, flies in the face of everything that modern environmental planning policies have been designed to achieve. We do not accept that the Highways Authority has undertaken a realistic traffic assessment of the surrounding road

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network and strongly request that Buckinghamshire County Council visit the site for a more comprehensive assessment of the traffic projections in comparison to what is realistically achievable by way of highway improvement.

Educational provision

It appears that once again, as with the application to develop the Holy Cross site, the applicant's provision for the increased educational needs arising from this development in Chalfont St Peter will be covered with a section 106 payment. This seems to be enough to appease the planning department at Chiltern District Council.

It is already clear that Chalfont St Peter middle school (C of E International School) is vastly oversubscribed, with no playing fields, green spaces or kitchens. With no room to extend this old Victorian school and no available land for its expansion, a section 106 payment is utterly pointless.

The village infant school also has inadequate facilities; and the Chalfont Community College, already sustained by temporary classrooms, has to teach children in shifts to combat the huge numbers of students.

Sewerage

No clear solution as to how the applicants intend to deal with the removal of sewerage from the Newland Park development has been made apparent. It is imperative that a clear sewerage and drainage plan be submitted by the applicants prior to any application being considered.

We firmly believe that it would be wise to defer decisions on large scale planning applications that rely on policies that are currently under such heavy dispute. Alternatively the application should be refused in accordance with saved policy.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Philip Donaldson', with a long horizontal flourish extending to the right.

Philip Donaldson

For and on behalf of SENSE4CSP