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**Our ref:** MR/jp/10.008

**Date:** 22<sup>nd</sup> April 2010

Dear Sirs

**Draft Core Strategy March 2010  
Submissions on behalf of Chalfont St Peter Parish Council**

Please find enclosed representations prepared on behalf of Chalfont St Peter Parish Council in connection with the Draft Core Strategy dated March 2010.

In the interests of clarity I can confirm that representations are submitted in respect of the following:

- Paragraph 2.1
- Paragraph 3.6.3
- Paragraph 4.3.1
- Paragraph 5.1
- Paragraph 5.4
- Paragraph 5.4 – The Vision for Chalfont St Peter
- Paragraph 6.1
- Paragraph 6.2
- Paragraph 7.4
- Paragraph 7.6
- Paragraph 7.8
- Paragraph 7.13 – Table 1 Housing Delivery
- Paragraph 12.2
- Paragraph 17.2
- Paragraph 21.1
- Policy CS1
- Policy CS3
- Policy CS15
- Policy CS16
- Policy CS17
- Policy CS24
- Policy CS35
- Policy CS42

I would be grateful if you could confirm receipt of these representations which I look forward to discussing with you in detail in due course.

Yours sincerely

**CERDA PLANNING LIMITED**

**Michael Robson**

Director

Enc:

Cc: Richard Allen Chalfont St Peter Parish Council – by e-mail

## **Paragraph 2.1**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

## **Paragraph 2.1**

### **Question 4**

The Council should give very serious consideration to reviewing the process in which the Local Development Framework has progressed, the consultation undertaken, and the overall approach.

This is on the basis that the Draft Core Strategy is not sound since:

- It is not founded on a robust and credible evidence base prepared in advance of the drafting of the latest Draft Core Strategy; and
- The most appropriate strategy when considered against the reasonable alternatives has not been followed.

It is not considered appropriate to merely re-consult on a Draft Core Strategy after evidence base has been prepared without reviewing thoroughly the strategy to locating development and the overall policies of the Draft Core Strategy. There is a significant risk that the entire basis of the Draft Core Strategy is not sound and if that were found to be the case by the Inspector in the Examination in due course, it is possible for the entire Draft Core Strategy to be thrown out the result of which the Council would have to commence with an entirely new Core Strategy.

This was the approach taken by Inspectors in respect of the Examinations into the Lichfield District Local Development Framework and Stafford Borough Local Development Framework, where in both instances the Councils had to start from first principles as opposed to back-tracking perhaps one or two consultation stages and amending their Core Strategy.

Cerda Planning on behalf of Chalfont St Peter Parish Council therefore request that the Draft Core Strategy be taken back to Issues and Options stage, and be the subject of thorough community engagement with a transparent strategy developed in consultation with the local community with genuine alternative options for development growth put forward as part of the alternative plan strategies for consideration.

### **Question 5**

Paragraph 2.1 makes clear that the development of the Draft Core Strategy has been challenging for the Council. Two fundamental issues were brought to the attention of the Council subsequent to the Preferred Options consultation in summer 2006, specifically that the evidence base to the Core Strategy was significantly lacking, and clearer choices were to be put forward for the future of Chiltern District.

Independent advice at this time made clear that the Core Strategy, if it were to be progressed in the manner proposed, would fail the tests of soundness.

The Council had two choices at this important crossroads into the emerging Local Development Framework. Either to go back to first principles, and engage fully with the local community at Issues and Options stage based on a well founded and documented evidence base, setting out alternative plan strategies based thereon, or to put the existing Draft Core Strategy into abeyance whilst additional evidence base was prepared, minor changes made to the alternative plan strategies, and then a further round of consultation undertaken.

Regrettably, the latter approach was taken. Whilst this may appear to be the most resource efficient approach to taking the Draft Core Strategy forward, in practice this could lead to a significant difficulty for the Council in the event that the Inspector in the subsequent Examination finds the Council have not robustly reviewed the plan strategy in the context of the significant additional evidence base required.

Very grave concerns are also expressed with regard to both the original consultation and the current consultation in respect of formally there was a very low response rate to the consultation amounting to 0.19% from Chalfont St Peter and lower elsewhere, such that the consultation responses cannot be relied upon. In any event the responses were largely disregarded – for example, only one respondent from Chalfont St Peter supported strategic Option c).

In respect of the latter, of the questionnaires issued, these were issued to each household rather than each adult, errors in respect of confidentiality have discouraged responses, and in overall terms the consultation is considered to be leading with a lack of transparency.

Very grave concerns are also expressed that the Council have not meaningfully addressed the earlier concerns that the Draft Core Strategy would fail the tests of soundness since the plan strategies have changed little since the early inception of the Draft Core Strategy which at that time was based on a wholly inadequate evidence base.

As opposed to proceeding with the Draft Core Strategy which has changed little, and is largely based on a wholly inadequate evidence base, an approach taken by Lichfield District and Stafford Borough which resulted in their Core Strategies being thrown out in their entirety by the Inspector at Examination, the Council would be better placed taking the Core Strategy back to first principles and develop the plan strategies for thorough consultation based upon the increased evidence base.

This approach would ensure that the Draft Core Strategy is far more likely to be sound since it would be founded on a robust and credible evidence base, and in consequence the most appropriate strategy when considered against the reasonable alternatives is more likely to be developed.

**Paragraph 3.6.3**

**Question 1**

Yes

**Question 2**

No

**Question 3**

Paragraph 3.6.3

**Question 4**

No comment

**Question 5**

Support is offered in respect of Paragraph 3.6.3 on behalf of Chalfont St Peter Parish Council in respect of the description of Chalfont St Peter. In particular, it is noted that Chalfont St Peter includes The Grange which for nearly 350 years was the medieval manor and Court of Missenden Abbey. Furthermore, support is offered in respect of the description that the village is defined by its open spaces.

These aspects demonstrates the importance of The Grange as an open space to the village of Chalfont St Peter, and the highly important context of The Grange as a heritage asset to the District.

**Paragraph 4.3.1**

**Question 1**

Yes

**Question 2**

No

**Question 3**

Paragraph 4.3.1

**Question 4**

No comment

**Question 5**

Support is offered in respect of Paragraph 4.3.1 on behalf of Chalfont St Peter Parish Council particularly in respect of the need to:

- Manage development pressures on the urban and rural environment and preserve the Districts natural and cultural heritage; and
- Encouraging and supporting healthy lifestyles.

Both are set out within the Sustainable Community Strategy for Chiltern.

The Sustainable Community Strategy for Chiltern is an important element to the LDF evidence base and therefore carries significant weight in developing the Draft Core Strategy. Consequently, it is important that the overall objectives and strategies of the Draft Core Strategy accord with the above guiding principles.

**Paragraph 5.1**

**Question 1**

Yes

**Question 2**

No

**Question 3**

Paragraph 5.1

**Question 4**

No comment

**Question 5**

Support is offered in respect of Paragraph 5.1 on behalf of Chalfont St Peter Parish Council in respect of:

- The opportunity for communities to shape the places in which they live; and
- The need to conserve the character of the District without wholesale change.

This approach, particularly in respect of community consultation and the importance placed thereon, is embedded within PPS1 and PPS12.

**Paragraph 5.4**

**Question 1**

Yes

**Question 2**

No

**Question 3**

Paragraph 5.4

**Question 4**

No comment

**Question 5**

Support is offered in respect of Paragraph 5.4 on behalf of Chalfont St Peter Parish Council since the Vision for Chiltern largely accords with the Sustainable Community Strategy.

Particular support is offered with regard to the penultimate bullet point, which requires as part of the vision a place with a wide range of accessible leisure opportunities.

This applies equally to Chalfont St Peter as to any other location within the District, and encompasses both publicly accessible open space and private open space, including land in use as, or last in use as, education sports fields.

## Paragraph 5.4 – The Vision for Chalfont St Peter

### Question 1

Yes in part

### Question 2

Yes

### Question 3

Paragraph 5.4 – Vision for Chalfont St Peter

### Question 4

The Visions for Chalfont St Peter should include a second paragraph to be drafted as follows:

***“Development in Chalfont St Peter shall accord with the Village Design Statement which comprises a grass roots, locally prepared document which has been the subject of public consultation and adopted by Chiltern District Council.***

***Furthermore, development in Chalfont St Peter should retain the rustic village ambience, retaining the legacy of heritage assets both built-form and arboricultural, with the retention of all open spaces, and demolition of the 1960's precinct and so returning the village centre to its original form”.***

### Question 5

Support is offered in respect of the Vision for Chalfont St Peter on behalf of Chalfont St Peter Parish Council, particularly with regard:

- The retention and improvement of local character; and
- Improved local facilities, particularly for the young and elderly

These aspects clearly point to the need to retain all existing facilities within Chalfont St Peter, including buildings currently in use or last in use as community facilities such as schools, and uses of land currently in use or last in use as open space and recreation for all aspects of the community, but particularly the young. This includes land currently or last in use as school playing fields.

Objections are however raised with regard to the Vision for Chalfont St Peter since this does not refer to the importance of proposals according with the Village Design Statement, which is a grass roots, community led document the subject of public consultation and subsequent refinement, and to be adopted by Chiltern District Council as a material planning consideration.

**Paragraph 6.1**

**Question 1**

Yes

**Question 2**

No

**Question 3**

Paragraph 6.1

**Question 4**

No comment

**Question 5**

Support is offered in respect of the objectives of the Draft Core Strategy on behalf of Chalfont St Peter Parish Council particularly in respect of the second, fourth and fifth bullet points which in turn require conservation and enhancement of the natural and built environment and the cultural and historical assets of the District; a healthy society with increased participation in physical activities and improved support and positive activities for children and young people together with improved access to health and leisure services; and a cohesive strong, confident and active community with an increase in community participation.

These aspects clearly demonstrate the need to protect existing open spaces, sports facilities and community uses as expanded upon in other policies in the Draft Core Strategy.

## **Paragraph 6.2**

### **Question 1**

Yes in part

### **Question 2**

Yes

### **Question 3**

Paragraph 6.2

### **Question 4**

The general principles of Paragraph 6.2 of the Draft Core Strategy are supported, however objection is raised on behalf of Chalfont St Peter Parish Council with regard to point (vi) insofar as a fourth target should be added to the conservation and enhancement of the Chiltern's Area of Outstanding Natural Beauty and its setting and other natural assets (including biodiversity and geo-diversity) of the District as follows:

***"Target 4. Ensure no loss of public or private open space and recreation areas".***

### **Question 5**

The underlying strategy and objectives of the Draft Core Strategy, as founded on the Sustainable Community Strategy, is for a place with a wide range of accessible leisure opportunities; encouraging and supporting healthy lifestyles; and protecting natural, cultural and heritage assets within the District of which, The Grange in Chalfont St Peter is one (as referred to in Paragraph 3.6.3 of the Draft Core Strategy).

Given the importance of these objectives and strategies underlying the Draft Core Strategy, it is appropriate to add a target to Paragraph 6.2 ensuring that no public or private open space or leisure facilities are lost to other development since any loss would undermine the overall strategies and objectives of the Draft Core Strategy including the evidence base, and consequently would fail the tests of soundness.

## **Paragraph 7.4**

### **Question 1**

Yes

### **Question 2**

No

### **Question 3**

Paragraph 7.4

### **Question 4**

No comment

### **Question 5**

Although no specific changes are suggested in respect of Paragraph 7.4, there is a fundamental issue within this paragraphs drafting that creates conflict within the Draft Core Strategy.

The paragraph states that the Council does not consider that delivery of the amount of housing set out in the South East Plan requires the release of Green Belt land and the Council have therefore rejected this as an option.

This is, as a matter of fact, incorrect. In seeking to take the Core Strategy back one stage, an approach which is the subject of objection on behalf of Chalfont St Peter Parish Council – see Paragraph 2.1 - the four options offered for development growth are as follows:

- Option A – No Green Belt release required;
- Option B – Minor Green Belt release required;
- Option C – Minor Green Belt release required; and
- Option D – More significant Green Belt release required.

This is wholly in conflict with the provisions of Paragraph 7.4 and demonstrates significant inaccuracies and conflict within the Draft Core Strategy.

More importantly, the further consultation exercise that has been undertaken by the Council in taking the Draft Core Strategy back one stage, has been based wholly and without exception on only four options, none of which accord with the earlier stages of consultation where there was very strong opposition to developing the Green Belt.

Chalfont St Peter Parish Council consider that this serves to demonstrate the failings of the Draft Core Strategy, and the importance of taking the Draft Core Strategy back to first principles, Issues and Options stage, based upon a robust evidence base, all as outlined in the objections raised by Chalfont St Peter Parish Council in respect of Paragraph 2.1

## Paragraph 7.6

### Question 1

No

### Question 2

Yes

### Question 3

Paragraph 7.6

### Question 4

It is considered that a fifth option for development growth should have been advanced by the Council, so as to put forward for community consultation a further reasonable alternative to accommodating development growth, specifically providing a hybrid between options C and D such that new development would be appropriate within the three most accessible major settlements, Chesham, Amersham and Chalfont St Peter, but also allowing more dispersed pattern of development within and on the edge of many sustainable smaller settlements.

This approach would be consistent with a significant number of other local authorities in preparing their Local Development Framework, including for example Hinckley and Bosworth Borough, with the fifth option drafted as follows:

***“E – a fifth scenario seeking to encourage development in the three most accessible major settlements, Chesham, Amersham and Chalfont St Peter, but also directing development to other sustainable smaller settlements”.***

This approach would enable the benefits of new development to be spread more widely across the District, accord with the principles of the Taylor Review which seeks to encourage a sea change in the way in which local planning authorities approach rural communities, would take pressure off development in the three major settlements of Chesham, Amersham and Chalfont St Peter, and would avoid the need for Green Belt release.

This approach would however need to be founded upon a detailed settlement hierarchy, an approach adopted by a significant number of other local planning authorities in order to determine, as part of the evidence base to the Local Development Framework, that the approach put forward is the most appropriate strategy when considered against the reasonable alternatives.

In the absence of the hybrid development scenario, a thorough evidence base which includes a robust settlement hierarchy, Chalfont St Peter Parish Council object to Paragraph 7.6 since the approach taken is not founded on a robust and credible evidence base and does not set out all the reasonable alternatives.

### **Question 5**

The Draft Core Strategy is founded upon consultation on four alternative strategies for development growth. This is flawed and the basis upon which the four strategies have been derived is not founded on a robust and credible evidence base such that it fails the test of soundness. This is as set out in the objections to Paragraph 21.

In particular, earlier public consultation made absolutely clear that there are strong objection to developing on Green Belt land, and yet three of the four options advanced by the Council for further public consultation included Green Belt release. Given the importance of community engagement in the planning process, as prescribed within PPS1 and PPS12, and as further set out in the Sustainable Community Strategy where the views of local communities are important to place shaping in Chiltern, the approach cannot be supported.

It is not clear how the four Options for Growth were derived, why other Options were discounted, why only four Options were put forward, and what opportunities exist for providing a hybrid of the Options.

**Paragraph 7.8**

**Question 1**

Yes

**Question 2**

No

**Question 3**

Paragraph 7.8

**Question 4**

No comment

**Question 5**

Although no objections are submitted in respect of Paragraph 7.8 on behalf of Chalfont St Peter Parish Council and no changes are proposed in respect of this paragraph, it is evident that the strategy that has been adopted by the Council in the Draft Core Strategy, namely scenario three seeking to concentrate new development in the three most accessible major settlements of Chesham, Amersham and Chalfont St Peter, is not being followed since Paragraph 7.8 makes clear that Policy CS1 allows for a continuation of the trend for some development in the larger villages.

As set out in the representations submitted on behalf of Chalfont St Peter Parish Council in respect of Paragraph 7.6, the approach to developing in the sustainable smaller settlements is endorsed and indeed promoted as a fifth scenario which should be the subject of thorough public consultation being based on a credible and robust evidence base including a detailed settlement hierarchy which is presently lacking.

## **Paragraph 7.13 – Table 1 Housing Delivery**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

Paragraph 7.13 – Table 1 Housing Delivery

### **Question 4**

The basis upon which housing delivery has been assessed is fundamentally flawed and needs to be amended to reflect:

- The need for the housing delivery to be based on a robust and credible evidence base, in particular the SHLAA;
- The need to significantly reduce the quantum of housing within Chalfont St Peter Village reflecting the constraints therein, and removing any allocation of housing to Newlands Park given that this comprises Green Belt release in conflict with the overarching strategy of the Draft Core Strategy;
- The need to increase housing provision within other settlements, including sustainable smaller settlements in accordance with a settlement hierarchy that should be objectively and robustly undertaken; and
- The need for housing delivery to take account of windfall sites given that there is no phasing within the delivery and consequently PPS3 would allow for the allowance of windfall sites within the first five years of the trajectory, and indeed beyond up to 2026.

These fundamental aspects indicate the need for a major overview of the housing delivery table, and in turn the amount and distribution of residential development set out within Policy CS1.

This can only be undertaken by a thorough re-examination of the evidence base, including the need for an objective and robust settlement hierarchy, a re-appraisal of the four Options for Growth and how these have been derived, and thorough public consultation which should be taken back to first principles at Issues and Options stage.

In the absence of any or all of these actions the Draft Core Strategy fails the test of soundness since it is not founded on a robust and credible evidence base and is not the most appropriate strategy when considered against the reasonable alternatives.

### **Question 5**

There are a number of reasons as to why the housing delivery set out within Table 1 to Paragraph 7.13 is flawed.

Firstly, columns e), f) and g) provide a confused approach. It is not clear how the column e) figures have been derived, and it would appear that these are not based on any SHLAA sites.

Given that the SHLAA forms the evidence base to the Local Development Framework and thus carries significant weight in the formulation of policies including housing delivery, the lack of reliance on the SHLAA is a fundamental error and consequently housing delivery is not founded on a robust and credible evidence base.

Secondly, in any event, SHLAA sites appear to be providing a top-up to housing delivery rather than the basis of delivery. For example, column g) states that the figures are derived from additional dwellings on sites to be drawn from the SHLAA, whilst column h) states the additional potential in the SHLAA from which column g) sites can be drawn.

Thirdly, there is no phasing mechanism within the housing delivery and it is not clear which of the identified sites are to form the first five years of housing supply, and in respect of the larger sites whether the Council have assessed whether all of the yield can be delivered within the first five years of the plan period.

Fourthly, the housing delivery table does not make clear which of the sites to be brought forward are greenfield and which of the sites to be brought forward are brownfield. It is well founded within PPS1 and PPS3 in addition to the South East Plan that previously developed sites should be utilised in advance of greenfield release.

Fifthly, given the lack of any phasing within the housing delivery table, it is entirely appropriate to include a windfall allowance within Table 1 to Paragraph 7.13. This omission is a significant failing since Chiltern District have historically been heavily reliant upon windfall sites coming forward.

Indeed, the quantum of windfall sites is such that the number of large allocated sites can be significantly reduced and constrained sites such as The Grange in Chalfont St Peter, and Green Belt release sites such as Newlands Park in Chalfont Common (also part of Chalfont St Peter Parish) should be excluded given uncertainties over their deliverability.

This approach would accord with Paragraph 2.8 of the SHLAA which makes clear that Chiltern District relies upon windfalls, together with Paragraphs 5.17 to 5.19 of the SHLAA which sets out the importance of a small site allowance for Chiltern District.

By way of a worked to example, as at 31<sup>st</sup> March 2009 46 windfall dwellings had been built since the start of the Plan period across the District and planning permission had been granted for a further 24 additional dwellings. Taking a precautionary approach and utilising the 46 constructed units, even in a recessionary environment this equates to 15.3 windfall dwellings per annum. Over a 20 year period this would equate to a minimum of 306 units, and likely to be significantly more given that the Plan period will enjoy significantly improved economic conditions. This approach would indicate that heavily constrained sites that are the subject of questionable deliverability and upon which the Plan strategy is founded, for example The Grange in Chalfont St Peter, could readily be excluded whilst the Newlands Park site could similarly be excluded from the Plan strategy given it comprises Green Belt release.

## **Paragraph 12.2**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

Paragraph 12.2

### **Question 4**

It is suggested that the Draft Core Strategy be amended as follows:

- The allocation of housing within Chalfont St Peter should reflect the suggested amendments to Policy CS1 insofar as significantly less housing should be directed to Chalfont St Peter and the Newlands Park site (both of which fall within Chalfont St Peter Parish);
- Where housing is proposed, this should reflect the provisions of the SHLAA which identifies at Paragraph 7.6 that Chalfont St Peter has 22 previously developed sites comprising 1523 units of un-prioritised capacity. The present approach seeks to allocate a greenfield site of questionable deliverability and the current strategy is not therefore effective and thus fails the test of soundness;
- In any event, the need for a windfall allowance which is acceptable in accordance with PPS3 would indicate that there is no need to allocate any housing sites within Chalfont St Peter.

### **Question 5**

The approach that has been advanced does not accord with PPS3 which permits the provision of windfall sites within the housing trajectory in circumstances where there is no phasing policy in place which is the case in this instance.

Furthermore, the SHLAA, which forms important evidence base to the Local Development Framework, sets out the importance of a small site allowance (in other words provision for windfall sites) for Chiltern District at Paragraphs 5.17 to 5.19.

The approach to allocating sites in Chalfont St Peter should therefore reflect these important provisions so as to avoid an over-provision of housing noting that the South East Plan Housing requirement for Chiltern District is not expressed as minima, but instead is a maximum limit on housing to be provided.

## **Paragraph 17.2**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

Paragraph 17.2

### **Question 4**

The Draft Core Strategy should be amended so that no homes for people with support needs are proposed on the Newlands Park and National Society for Epilepsy (MSE) sites in Chalfont St Peter, since these comprise Green Belt sites in conflict with the strategy adopted by the Council underlying the Draft Core Strategy.

Furthermore, no homes for people with support needs should be allocated to the Holy Cross Convent site in Chalfont St Peter principally for the reasons set out in respect of Objections to Policy CS15, noting that the site is greenfield, is the subject of questionable deliverability, will result in the loss of leisure and recreation facilities and, separately, community facilities, and is the subject of significant heritage constraints.

The approach to allocating homes for people with support needs should be based on an evidence base principally comprising a settlement hierarchy based on an objective and robust assessment of the sustainability credentials of all settlements, but also in relation to a thorough housing need assessment and the strategic Housing Market Assessment to ensure that the location of homes for people with support needs provides a best fit for the area's most in need.

### **Question 5**

The Draft Core Strategy should be amended to ensure the benefits of providing homes for people with support needs are spread more geographically across the District as opposed to providing all of this specialist housing in one location.

The precise distribution should be based on a thorough needs assessment, together with preparation of a settlement hierarchy which is a current failing of the LDF evidence base.

In this way, the needs of the entire District can be met as opposed to having to relocate people with support needs away from existing communities which in many cases they have lived in for significant periods of time.

**Paragraph 21.1**

**Question 1**

Yes

**Question 2**

No

**Question 3**

Paragraph 21.1

**Question 4**

No comments

**Question 5**

Support is offered on behalf of Chalfont St Peter Parish Council in respect of the need to provide new play facilities and youth facilities in Chalfont St Peter.

This approach accords with the Councils 2005 Open Space Audit which comprises evidence base to the Local Development Framework and therefore carries significant weight.

This sets out at Paragraph 6.3 that there is a need to ensure sufficient space for outdoor sport including private and education sector land. Importantly, Paragraph 8.678 states that the exclusion of education facilities in Chalfont St Peter from the Open Space Audit would lead to an under-provision of playing pitches and therefore the community use of education facilities, let alone the loss of such facilities, is an important element in the supply calculation.

## **Policy CS1**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

Policy CS1

### **Question 4**

The basis upon which the amount and distribution of residential development 2006 to 2026 has been assessed needs to be fundamentally amended to reflect:

- The need for the housing delivery to be based on a robust and credible evidence base, in particular the SHLAA;
- The need to significantly reduce the quantum of housing within Chalfont St Peter Village reflecting to the constraints therein, and removing any allocation of housing to Newlands Park given that this comprises Green Belt release in conflict with the overarching strategy of the Draft Core Strategy;
- The need to increase housing provision within other settlements, including sustainable smaller settlements in accordance with the settlement hierarchy that should be objectively and robustly undertaken; and
- The need for housing delivery to take account of windfall sites given that there is no phasing within the delivery and consequently PPS3 would allow for the allowance of windfall sites within the first five years of the trajectory, and indeed beyond up to 2026.

These fundamental aspects indicate the need for a major review of the Housing Delivery Table, and in turn the amount and distribution of residential development set out within Policy CS1.

This can only be undertaken by a thorough re-examination of the evidence base, including the need for an objective and robust settlement hierarchy, a re-appraisal of the four Options for Growth and how these have been derived, and thorough public consultation which should be taken back to first principles at Issues and Options stage.

In the absence of any or all of these actions the Draft Core Strategy fails the test of soundness since it is not founded on a robust and credible evidence base and is not the most appropriate strategy when considered against the reasonable alternatives.

### **Question 5**

There are a number of reasons as why the amount and distribution of residential development set out within Policy CS1 is flawed.

This policy appears to be based upon Delivery of Housing as set out within Table 1 – Housing Delivery to Paragraph 7.13. Objections on behalf of Chalfont St Peter Parish Council to Paragraph 7.13 – Table 1 Housing Delivery makes clear that the approach is not based upon the SHLAA; does not include for any windfall allowance; there is no phasing mechanism within the housing delivery and it is not clear which of the identified sites form the first five years of housing supply and in respect of the larger sites whether the Council have assessed whether all of the yield can be delivered within the first five years of the Plan period; and the housing delivery table does not make clear which of the sites to be brought forward are greenfield and which of the sites to be brought forward are brownfield.

Notwithstanding, the quantum of housing that is proposed for Chalfont St Peter Parish, which includes the Chalfont St Peter Village site at 400 units and Newlands Park site at 200 units, is significant in the context of an overall net requirement of 2900 dwellings.

The housing delivery is reliant upon The Grange site coming forward. This site is however the subject of questionable delivery, given the significant constraints summarised as follows:-

- The site comprises greenfield land and is not previously developed for the most part such that sequentially it falls below the provision of previously developed sites in other sustainable locations;
- The site comprises amenity open space and playing pitches which should be protected for their own sake;
- The site includes community uses which should be protected for their own sake;
- The site is of significant archaeological interest and historical interest comprising land which for nearly 350 years was the medieval manor and Court of Missingdon Abbey, at the centre of the Village, and also includes the Convent which is the subject of an outstanding request for statutory listing to English Heritage;
- The site contains trees and woodland which are of such significant amenity value as to warrant their protection under a blanket Tree Preservation Order;
- The site is rich in biodiversity which should be protected for its own sake;
- The site is the subject of significant highway constraints and development proposals show that radical alterations to the highway network, including build outs within adopted highway, are necessary if the site is to be accessed.

In these terms the site is clearly of questionable deliverability, which calls into question the entire approach to housing provision within Chalfont St Peter.

It is not considered to be the most appropriate strategy when considered against all reasonable alternatives such that the Plan fails the test of soundness.

A more appropriate alternative would be to consider to redistributing housing across other sustainable settlements within the District where less constrained sites are available, suitable and deliverable.

**Policy CS3**

**Question 1**

Yes in part

**Question 2**

No

**Question 3**

Policy CS3

**Question 4**

No comment

**Question 5**

Although no changes are suggested in respect of Policy CS3 on behalf of Chalfont St Peter Parish Council, the provision therein indicate that other strategies of the Plan conflict with the policy particularly with regard to the target that 80% of new homes are to be built on previously developed land.

In Chalfont St Peter, the Plan strategy is reliant upon a site of questionable deliverability at The Grange, which comprises largely greenfield land, and consequently the requirement for a minimum of 80% of new homes to be built on previously developed land certainly cannot be met within Chalfont St Peter in accordance with the current drafting of the Draft Core Strategy, and District wide it is unlikely that this target will be met given that the Chalfont St Peter housing allocation at The Grange comprises 8% of the overall 2900 net additional dwelling requirement.

## **Policy CS15**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

Policy CS15

### **Question 4**

The basis upon which the amount and distribution of residential development 2006 to 2026 has been assessed needs to be fundamentally amended to reflect:

- The need for the housing delivery to be based on a robust and credible evidence base, in particular the SHLAA;
- The need to significantly reduce the quantum of housing within Chalfont St Peter Village reflecting to the constraints therein, and removing any allocation of housing to Newlands Park given that this comprises Green Belt release in conflict with the overarching strategy of the Draft Core Strategy;
- The need to increase housing provision within other settlements, including sustainable smaller settlements in accordance with the settlement hierarchy that should be objectively and robustly undertaken; and
- The need for housing delivery to take account of windfall sites given that there is no phasing within the delivery and consequently PPS3 would allow for the allowance of windfall sites within the first five years of the trajectory, and indeed beyond up to 2026.

These fundamental aspects indicate the need for a major review of the Housing Delivery Table, and in turn the amount and distribution of residential development set out within Policy CS1.

This can only be undertaken by a thorough re-examination of the evidence base, including the need for an objective and robust settlement hierarchy, a re-appraisal of the four Options for Growth and how these have been derived, and thorough public consultation which should be taken back to first principles at Issues and Options stage.

In the absence of any or all of these actions the Draft Core Strategy fails the test of soundness since it is not founded on a robust and credible evidence base and is not the most appropriate strategy when considered against the reasonable alternatives.

### **Question 5**

There are a number of reasons as why the amount and distribution of residential development set out within Policy CS1 is flawed.

This policy appears to be based upon Delivery of Housing as set out within Table 1 – Housing Delivery to Paragraph 7.13. Objections on behalf of Chalfont St Peter Parish Council to Paragraph 7.13 – Table 1 Housing Delivery makes clear that the approach is not based upon the SHLAA; does not include for any windfall allowance; there is no phasing mechanism within the housing delivery and it is not clear which of the identified sites form the first five years of housing supply and in respect of the larger sites whether the Council have assessed whether all of the yield can be delivered within the first five years of the Plan period; and the housing delivery table does not make clear which of the sites to be brought forward are greenfield and which of the sites to be brought forward are brownfield.

Notwithstanding, the quantum of housing that is proposed for Chalfont St Peter Parish, which includes the Chalfont St Peter Village site at 400 units and Newlands Park site at 200 units, is significant in the context of an overall net requirement of 2900 dwellings.

The housing delivery is reliant upon The Grange site coming forward. This site is however the subject of questionable delivery, given the significant constraints summarised as follows:-

- The site comprises greenfield land and is not previously developed for the most part such that sequentially it falls below the provision of previously developed sites in other sustainable locations;
- The site comprises amenity open space and playing pitches which should be protected for their own sake;
- The site includes community uses which should be protected for their own sake;
- The site is of significant archaeological interest and historical interest comprising land which for nearly 350 years was the medieval manor and Court of Missingdon Abbey, at the centre of the Village, and also includes the Convent which is the subject of an outstanding request for statutory listing to English Heritage;
- The site contains trees and woodland which are of such significant amenity value as to warrant their protection under a blanket Tree Preservation Order;
- The site is rich in biodiversity which should be protected for its own sake;
- The site is the subject of significant highway constraints and development proposals show that radical alterations to the highway network, including build outs within adopted highway, are necessary if the site is to be accessed.

In these terms the site is clearly of questionable deliverability, which calls into question the entire approach to housing provision within Chalfont St Peter.

It is not considered to be the most appropriate strategy when considered against all reasonable alternatives such that the Plan fails the test of soundness.

A more appropriate alternative would be to consider to redistributing housing across other sustainable settlements within the District where less constrained sites are available, suitable and deliverable.

## **Policy CS16**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

Policy CS16

### **Question 4**

Policy CS16 should be removed from the Draft Core Strategy on the basis that it comprises Green Belt release in conflict with other strategies within the Draft Core Strategy which seek to avoid the use of Green Belt for the provision of housing land.

### **Question 5**

Policy CS16 provides for housing on an existing site within the Green Belt at Newlands Park.

The Draft Core Strategy makes clear that Green Belt release is not a requirement to accommodate housing development. In this context there is significant conflict within the Draft Core Strategy such that housing at the Newlands Park site should be removed.

Setting aside the conflict within the Draft Core Strategy, the Newlands Park site does not offer a sustainable option for housing growth. The site is some distance from the urban area, in an isolated location with significant constraints in respect of the Chiltern's Area of Outstanding Natural Beauty.

It is not the most appropriate strategy when considered against the alternatives insofar as other previously developed land within urban areas in sustainable locations are available without the need for Green Belt release.

These have been identified within the SHLAA. As set out within other objections on behalf of Chalfont St Peter Parish Council, the overarching strategy for housing distribution should be the subject of significant re-appraisal principally through the preparation of a settlement hierarchy in order that housing can be distributed across the District with a greater emphasis on smaller, sustainable settlements.

Such an approach would avoid the need for Green Belt release of an isolated site which offers poor sustainability credentials such as Newlands Park.

## **Policy CS17**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

Policy CS17

### **Question 4**

The Policy should be amended to make clear that updating of the NSE is fully supported, but wholesale development is not acceptable.

### **Question 5**

Policy CS17 provides for specialist housing on an existing site within the Green Belt at the NSE.

The Draft Core Strategy makes clear that Green Belt release is not a requirement to accommodate housing development. In this context there is significant conflict within the Draft Core Strategy such that housing at the Newlands Park site should be removed.

Setting aside the conflict within the Draft Core Strategy, the NSE site does not offer a sustainable option for housing growth. The site is some distance from the urban area, in an isolated location with significant constraints in respect of the Chiltern's Area of Outstanding Natural Beauty.

It is not the most appropriate strategy when considered against the alternatives insofar as other previously developed land within urban areas in sustainable locations are available without the need for Green Belt release.

These have been identified within the SHLAA. As set out within other objections on behalf of Chalfont St Peter Parish Council, the overarching strategy for housing distribution should be the subject of significant re-appraisal principally through the preparation of a settlement hierarchy in order that housing can be distributed across the District with a greater emphasis on smaller, sustainable settlements.

Such an approach would avoid the need for Green Belt release of an isolated site which offers poor sustainability credentials such as NSE.

## **Policy CS24**

### **Question 1**

No

### **Question 2**

Yes

### **Question 3**

Policy CS24

### **Question 4**

Policy CS24 should be amended in respect of criteria a) and b) as follows:

***“a) Rural Areas – no specific minimum density, with densities to reflect local character and a distinctiveness of the area;***

***“b) Built-up Areas – no minimum density but target 30 dwellings per hectare, unless such a density in a particular location would conflict with the local character and distinctiveness of the area”.***

### **Question 5**

It is important that density thresholds are not imposed through policy which would limit the ability for development to come forward to take the opportunities available for improving the character and quality of an area in accordance with Paragraph 34 of PPS1.

Furthermore, PPS3 permits local authorities to allow development at less than 30 dwellings per hectare, and sets out at Paragraph 47 that there is no requirement for local authorities to set minimum densities within local policies.

There are areas of Chiltern District for example Chalfont St Peter that have been developed at historically low densities. Furthermore, the openness of areas such as Chalfont St Peter is one of the very strong characteristics which define the area. Increasing housing densities would conflict with the character of an area and should not be applied without firstly assessing the impact of development.

The existing density in Chalfont St Peter is 10 dwellings per hectare and this should be a starting point with regard to an assessment of the impact on townscape character. Following the historically low density would accord with the Village Design Statement which is a material planning consideration.

Consequently, a design led approach to density should be adopted, given that density is not an indicator of urban quality as set out in Towards an Urban Renaissance, and policies should not be written in such a rigid manner as to require a minimum density; instead the characteristics of an area should prevail in a design led approach.

**Policy CS35**

**Question 1**

Yes

**Question 2**

No

**Question 3**

Policy CS35

**Question 4**

No comments

**Question 5**

Biodiversity is linked to cultural and heritage assets and is important as a legacy for future generations. Biodiversity assets which include open spaces, trees, woodlands and hedgerow, should be retained for their own sake. Such an approach would accord with other strategies and objectives of the Draft Core Strategy.

## **Policy CS42**

### **Question 1**

Yes

### **Question 2**

Yes

### **Question 3**

Policy CS42

### **Question 4**

Policy CS42 should be amended in respect of the first bullet point to read as follows:

***“Only to permit the loss of community facilities in exceptional circumstances, and where applicants for development have clearly identified that the existing need for such facilities no longer exists, and the need for other community facilities does not exist now or in the future”***

### **Question 5**

Community facilities are an important element of the urban environment and assist in fostering engagement, interaction and provide facilities for meetings, local resources, recreation and sports facilities and so on. Consequently, their importance to urban and rural communities is not in question such that the principle for retaining such uses should be of a high priority in the Draft Core Strategy.

Whilst Policy CS42 provides support for the retention and improvement of such facilities, the wording of the policy should be improved and strengthened in this regard.