

Consultee Reference ID:  
(office use only)

Comment Reference:  
(office use only)

## PART B – DETAILED REPRESENTATIONS

### Please complete this section for each comment you wish to make

Please **do not include any personal details** other than your name in **PART B**, as this section will be made publically available and will be displayed on the Council's website.

Name of Respondent / Organisation:

SENSE4CSP

#### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS4

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

#### 2. Do you consider the Core Strategy is:

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

If it is the actual content on which you wish to comment on or object to it is likely it will relate to whether the Core Strategy is sound – in relation either to being justified, effective or consistent with national policy. If you have answered **NO** to Question 2(2) please continue to Question 3. In **all** other circumstances please go to Question 4.

#### 3. Do you consider the Core Strategy is unsound because is it not:

If you answered no to question 2(2) and do not tick a box we will have to make a judgement which might not be what you intended

(1) Justified

(This means that the Core Strategy should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts and evidence)

(2) Effective

(This means the Core Strategy should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities)

(3) Consistent with national policy

(The Core Strategy should be consistent with national policy. Where there is a departure, we must provide clear and convincing reasoning to justify our approach. Conversely, you may feel Chiltern District Council should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but we may not have done so. In this instance it will be important for you to say in your comments what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.)

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Table 1 of Policy CS4 should set out in full that as a sustainability principle localism/community consultation is a primary objective. Table 1 should also set out in full sustainability principles and the fact that most developments should be concentrated in areas closest to railway and underground stations.

*(Continue on separate sheet/expand box if necessary)*

**5. If you answered no to question 2(1) or 2(2), please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at Question 3 above where this relates to soundness. You will need to say why the change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

See above in paragraph 4.

*(Continue on separate sheet/expand box if necessary)*

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Name of Respondent / Organisation:

SENSE4CSP

### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS6

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

### 2. Do you consider the Core Strategy is:

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

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(1) Justified

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(2) Effective

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- Coherence with the strategies of neighbouring authorities)

(3) Consistent with national policy

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Land at the Holy Cross Convent site in Chalfont St Peter should be retained as educational in accordance with CDC's current saved Policies. Serious flaws were evident in CDC's botched approval in principle of housing on that site and in CDC's particular deliberate disregard of Saved Policy and the complete disregard of valid representations made by the statutory body Sport England. No account was given to the requirements of the owners of the Holy Cross site to seek an alternative educational use which they deliberately did not do and the decision of CDC in relation to this application is politican and significantly flawed and as such brings into disrepute and makes unsound the entire DCS given the reliance upon that site for housing development. In addition there are other significant issues with the Holy Cross site such as drainage, sustainability, loss of local facilities including loss of sport land objected to by Sport England and access issues which are significant. It is plainly an unsustainable site for housing and should be removed from policy CS6.

*(Continue on separate sheet/expand box if necessary)*

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The Holy Cross convent should be removed from Policy CS6. It should not be a development location other than for educational land as its primary objective and with the retention of public open space.

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SENSE4CSP

#### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS7

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

#### 2. Do you consider the Core Strategy is:

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

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(2) Effective

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- Coherence with the strategies of neighbouring authorities)

(3) Consistent with national policy

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Newlands Park as a development location is inherently unsustainable. Any development will of necessity harm the Chiltern Open Air Museum and will not conserve or enhance the Area of Outstanding National Beauty nor will it improve biodiversity. The principles within policies CS7 are contradictory and impossible to fulfill. Newlands Park is also in the green belt and should be retained as such. It is also an educational site and should be retained as such. Further no consideration has been given to the provision of schooling for the residents of the proposed new dwellings proposed for Chalfont St Peter. Loss of educational land in the context of this increased building plan is inconsistent and ill thought out.

*(Continue on separate sheet/expand box if necessary)*

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Newlands Park should be removed as a development location save as an educational establishment and with maximum retention of open land, no loss of openness of the green belt and no harm to the Chiltern Open Air Museum or AONB.

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Name of Respondent / Organisation:

SENSE4CSP

### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS8

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

### 2. Do you consider the Core Strategy is:

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

If it is the actual content on which you wish to comment on or object to it is likely it will relate to whether the Core Strategy is sound – in relation either to being justified, effective or consistent with national policy. If you have answered **NO** to Question 2(2) please continue to Question 3. In **all** other circumstances please go to Question 4.

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(1) Justified

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- Research/fact finding: the choices made in the plan are backed up by facts and evidence)

(2) Effective

(This means the Core Strategy should be deliverable, embracing:

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(3) Consistent with national policy

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The requirement of 40% of affordable dwellings per development is too high.

*(Continue on separate sheet/expand box if necessary)*

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We would suggest that there should be no fixed requirement for affordable housing save in areas within one mile of a railway or underground station when this number should be we would suggest a maximum of 30%.

*(Continue on separate sheet/expand box if necessary)*

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SENSE4CSP

### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS10

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

### 2. Do you consider the Core Strategy is:

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

If it is the actual content on which you wish to comment on or object to it is likely it will relate to whether the Core Strategy is sound – in relation either to being justified, effective or consistent with national policy. If you have answered **NO** to Question 2(2) please continue to Question 3. In **all** other circumstances please go to Question 4.

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(1) Justified

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(2) Effective

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(3) Consistent with national policy

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Affordable housing should encourage shared ownership. Most local people to Chalfont St Peter, may not understand the concept of affordable housing but would support it as they believe it allows their sons and daughters to get on the housing ladder. There should be a requirement that affordable housing is for local people only and determined by local criteria i.e. currently living with a family member or renting locally or employed locally. The majority of affordable housing should be shared ownership. Clearly subsidised rental housing does nothing whatsoever to encourage local people to get on the housing ladder.

*(Continue on separate sheet/expand box if necessary)*

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The DCS should specify that there should be an increased localism agenda in the provision of affordable housing. It should be a locally driven concept with affordable housing being allocated according to the local need. Criteria should be developed which gives affordable housing to local people i.e. those living nearby or with family members nearby or with current employment nearby. Some affordable housing should clearly be for key workers and must be retained as such. The policy should also be amended to provide for we would suggest at least 60% affordable housing to be of a shared ownership type.

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Name of Respondent / Organisation:

SENSE4CSP

### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS12

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

### 2. Do you consider the Core Strategy is

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

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(1) Justified

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(2) Effective

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There does not appear from the evidence base to be a demand for extra care provision in the area and in particular in Chalfont St Peter. The area cannot cope with both extra care units and the extra housing it has been allocated within the DCS. Chalfont St Peter is not able to accommodate the pressure on its services and these developments would be significantly detrimental to the character of Chalfont St Peter.

*(Continue on separate sheet/expand box if necessary)*

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The DCS should specify that these developments should be in areas that can accommodate the extra burden on infrastructure.

*(Continue on separate sheet/expand box if necessary)*

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Name of Respondent / Organisation:

SENSE4CSP

#### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS13

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

#### 2. Do you consider the Core Strategy is:

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

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We support policy CS13 on the grounds that there should be no loss of openness of the green belt at the NSE site. We support in the policy in that no development at the NSE site in Chalfont St Peter should be for anything other than medical facilities or for residential medical provision but on the basis that Chalfont St Peter as a whole cannot support the pressure on local services by any significant development on that site. There should be no development on the NSE site which increases any loss of Green belt land or any loss of openness of the site and any new buildings must not increase the current built footprint.

*(Continue on separate sheet/expand box if necessary)*

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The policy should be tightened up as per the comments above.

Please note however this does not mean that the core strategy is sound or justified as generally it is not but this policy CS13 is sound as amended above.

*(Continue on separate sheet/expand box if necessary)*

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Name of Respondent / Organisation:

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### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS20

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

### 2. Do you consider the Core Strategy is:

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

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This policy should specifically refer to taking into account localism and local development strategies such as the Chalfont St Peter Village Design Strategy. There should be greater emphasis on localism/community consultation.

*(Continue on separate sheet/expand box if necessary)*

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Reference should be made to implementation of local consultation and in the case of Chalfont St Peter, the Village Design Strategy. Local people should be consulted and their views taken into account as a priority on local developments. Local people should decide local development.

*(Continue on separate sheet/expand box if necessary)*

**Please note** – your comment should cover succinctly all the information, evidence and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be a subsequent opportunity to make further comments.

**After this stage, further submissions will be only at the request of the inspector, based on the matters and issues he/she identifies for examination.**

Consultee Reference ID:  
(office use only)

Comment Reference:  
(office use only)

## PART B – DETAILED REPRESENTATIONS

### Please complete this section for each comment you wish to make

Please **do not include any personal details** other than your name in **PART B**, as this section will be made publically available and will be displayed on the Council's website.

Name of Respondent / Organisation:

SENSE4CSP

#### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS26

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

#### 2. Do you consider the Core Strategy is:

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to Q6

(2) Sound

Yes

Go to Q6

No

Go to Q5

If it is the actual content on which you wish to comment on or object to it is likely it will relate to whether the Core Strategy is sound – in relation either to being justified, effective or consistent with national policy. If you have answered **NO** to Question 2(2) please continue to Question 3. In **all** other circumstances please go to Question 4.

#### 3. Do you consider the Core Strategy is unsound because is it not:

If you answered no to question 2(2) and do not tick a box we will have to make a judgement which might not be what you intended

(1) Justified

(This means that the Core Strategy should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts and evidence)

(2) Effective

(This means the Core Strategy should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities)

(3) Consistent with national policy

(The Core Strategy should be consistent with national policy. Where there is a departure, we must provide clear and convincing reasoning to justify our approach. Conversely, you may feel Chiltern District Council should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but we may not have done so. In this instance it will be important for you to say in your comments what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.)

Consultee Reference ID:  
(office use only)

Comment Reference:  
(office use only)

**4. Please give details of why you consider the Core Strategy not legally compliant or unsound. Please be as precise as possible. Alternatively, if you wish to support the legal compliance or soundness of the Core Strategy, please use this box to set out your comments.**

This policy should refer to local consultations and the new localism agenda. Any new development must be subject to local consultation and in Chalfont St Peter to the Village Design Survey. Local in this sense must mean local. Where development is proposed in a particular village such as Chalfont St Peter the view of Chalfont St Peter residents should be paramount and should carry greater weight in any process.

*(Continue on separate sheet/expand box if necessary)*

**5. If you answered no to question 2(1) or 2(2), please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at Question 3 above where this relates to soundness. You will need to say why the change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

See above.

*(Continue on separate sheet/expand box if necessary)*

**Please note – your comment should cover succinctly all the information, evidence and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be a subsequent opportunity to make further comments.**

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Consultee Reference ID:  
(office use only)

Comment Reference:  
(office use only)

## PART B – DETAILED REPRESENTATIONS

### Please complete this section for each comment you wish to make

Please **do not include any personal details** other than your name in **PART B**, as this section will be made publically available and will be displayed on the Council's website.

Name of Respondent / Organisation:

SENSE4CSP

### 1. To which part of the Core Strategy does this comment relate?

Paragraph

Policy

CS28

Proposals Map

Other

Are you (tick one):

Supporting

Objecting

Commenting

### 2. Do you consider the Core Strategy is

(see additional guidance at the end of this form)

(1) Legally compliant

Yes

Go to Q6

No

Go to  
Q6

(2) Sound

Yes

Go to Q6

No

Go to  
Q5

If it is the actual content on which you wish to comment on or object to it is likely it will relate to whether the Core Strategy is sound – in relation either to being justified, effective or consistent with national policy. If you have answered **NO** to Question 2(2) please continue to Question 3. In **all** other circumstances please go to Question 4.

### 3. Do you consider the Core Strategy is unsound because is it not:

If you answered no to question 2(2) and do not tick a box we will have to make a judgement which might not be what you intended

(1) Justified

(This means that the Core Strategy should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts and evidence)

(2) Effective

(This means the Core Strategy should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities)

(3) Consistent with national policy

(The Core Strategy should be consistent with national policy. Where there is a departure, we must provide clear and convincing reasoning to justify our approach. Conversely, you may feel Chiltern District Council should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but we may not have done so. In this instance it will be important for you to say in your comments what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.)

Consultee Reference ID:  
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**4. Please give details of why you consider the Core Strategy not legally compliant or unsound. Please be as precise as possible. Alternatively, if you wish to support the legal compliance or soundness of the Core Strategy, please use this box to set out your comments.**

This policy should specify that the Holy Cross Convent site should retain all its open space. There should be no loss of open space in the development. The policy should be amended. In particular the openness of other green spaces should be protected and in particular on the NSE site and Newlands Park site also in Chalfont St Peter.

*(Continue on separate sheet/expand box if necessary)*

**5. If you answered no to question 2(1) or 2(2), please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at Question 3 above where this relates to soundness. You will need to say why the change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

See comments in 4 above.

*(Continue on separate sheet/expand box if necessary)*

**Please note – your comment should cover succinctly all the information, evidence and supporting information necessary to support/justify the comment and the suggested change, as there will not normally be a subsequent opportunity to make further comments.**

**After this stage, further submissions will be only at the request of the inspector, based on the matters and issues he/she identifies for examination.**