**Aide Memoir for Responding To the Chiltern and South Bucks Local Plan Consultation**

* It is extremely important to state that you consider that the Chiltern and south Bucks (C&SB) Local Plan ‘**is not legally compliant’** because:
* it is in breach of the National Planning Policy Framework (NPPF)
* the removal of areas SPB7 (the Epilepsy Society site) and SPBP8 (Winkers Field) from the Green Belt is not justified, as they are within an area of high performing Green Belt and fail to demonstrate exceptional circumstances for removal.
* It is also important to state that you consider that the Local Plan to be ‘**unsound’** because:

(we recommend you include comments on some or all of the following)

* It fails to comply with paragraph 84 of the National Planning Policy Framework (NPPF), which emphasises the need to promote a sustainable pattern of development.
* The Local Plan states that the two Chafont St Peter (CSP) sites are in ‘a highly sustainable location’; this is untrue. They are outside the village centre, which is in a valley. The identified sites are at the peak of the adjacent very steep hill making access to and from amenities on foot or cycle extremely difficult. Policy SP SP1 states ‘*Development of all sizes and uses must accommodate walking and cycling as a primary means of transport to serve the development’.*
* Both sites fail to meet the maximum specified sustainable distances to a doctor’s surgery, train station, or hospital.
* The sites are particularly unsustainable in relation to transport (no station/adequate bus service). You could include specific details of traffic and road conditions in the area.
* Over 700 dwellings were allocated to CSP under the Core Strategy, which was meant to run until 2021. These have already been built or have planning permission, putting a significant strain on infrastructure. Further development is unfair and unsustainable.
* The 2016 Green Belt assessment is very poorly scored; it is biased, inconsistent and therefore unsound.
* No justification has been given for not including the many sites with lower Green Belt scores than the two allocated in CSP.
* The need to build houses is not a ground for the removal of the Green Belt.
* There are numerous Brown Field and poor performing Green Belt sites in the district that should have been included in preference to the high performing Green Belt sites in CSP.
* There are no ‘exceptional circumstances’ or justification for removal of the sites from the Green Belt (the ES site in particular) as it fulfils all five Green Belt purposes.

**1 ) To check the unrestricted sprawl of large built up areas**.

**2) To prevent neighbouring towns from merging into one another.**

* The ES site adjoins the Colne Valley Regional Park with ancient woodlands and provides an essential buffer between CSP, Newlands Park, Chalfont St Giles and Horn Hill.
	+ C&SB have rejected other sites on this basis, showing clear bias and inconsistency (details of inconsistent scoring can be found in the SENSE submission – page 9).
1. **To assist in safeguarding the countryside from encroachment.**
	* The ES site adjoins the Colne Valley Regional Park. Outside the built on areas, the ES site is very rural and the site as a whole is semi rural. This site should have been given a much higher score.
2. **To preserve the setting and special character of historic towns.**
	* The awarded score of 0 is totally unjustified. The four listed buildings on the site have been ignored. C&SB have ignored the 2014 Buckinghamshire and Milton Keynes Historic Towns Project (BMHT) and the 2011 Chalfont St Peter Buckinghamshire Historic Towns Assessment, which illustrates the important historical character of the ‘Chalfont Colony’ and states the site is of ‘high heritage value’. It also denotes that it achieves a high score on historical and commercial values and a medium score for aesthetic values. The BMHT gives the ‘Chalfont Colony’ a ‘high’ heritage value.
	* The CSP Historical Assessment states ‘Given the historic importance of the Chalfont Colony, it has the potential to be a conservation area in its own right’.
3. **To assist in urban regeneration by enforcing the recycling of derelict and other urban land.**
* C&SB have failed to give prioritised consideration to the many Brown Field sites and other urban land over the Green Belt sites in CSP.

**Epilepsy society Site – Area SPBP7**

* The proposed new Green Belt boundary is contrived and not defensible.
* The recently developed area of the ES site is compliant with Green Belt restrictions; this has not prevented a sympathetic, high quality development. Further development should be permitted under the same restrictions.
* The Local Plan disregards the democratically endorsed CSP Neighbourhood Plan.

The Local Plan states, ‘removal from the Green Belt would support the Chalfont St Peter Neighbourhood Plan’. This is absolutely not the case.

* Future development on the ES site should be for C2 use only (care homes, medical, assisted living). Planning should be approved according to existing Green Belt restrictions in line with the recently constructed, good quality and sympathetically built Audley Chalfont Dene and Porthaven developments.
* Development on the ES site will cause a significant adverse effect and a loss of amenity to the vulnerable residents at the Porthaven Care Home and the Audley development. The rural outlook is integral to their vision as it promotes the mental wellbeing of elderly residents.

**The Winkers Site – SPBP8**

* The points relating to the removal of the Green belt and sustainability mentioned above, also apply to SPBP8. This location is even more unsustainable in terms of transport and road infrastructure.
* The Paccar Scout Camp is a nationally important site and used by over 1500 young people each weekend and over 50,000 annually. Development on this site would do immense harm. Due to the destruction of the rural setting, the significant health and safety, and substantial safeguarding risks, it would severely threaten the existence of the facility all together.
* It is most likely that if the development on the Winkers site proceeds, it will cause the closure of the Paccar Scout Camp.

**Policies**

Policies within the local plan will supersede existing Chiltern and South Bucks policies. This is a complex matter on which to respond. The Parish Council’s consultant will evaluate the effect of the new policies and include this in the Parish council’s response.

**AT THE END OF YOUR RESPONSE WE STRONGLY RECOMMEND YOU ADD:**

* I endorse and support the SENSE and CSP Parish Council’s responses to the Chiltern and South Bucks Local Plan consultation.
* I do not wish to speak at the inquiry, but would like representatives from SENSE4CSP and Chalfont St Peter Parish Council to speak on my behalf.