**This document is in three parts.**

1. **Statements regarding Green Belt – for info only**
2. **A list of the questions posed by the consultation – it is not mandatory or required that all are answered. Whilst a Sense response will addresses most of these, please feel free to also comment on any of these if you have read the documents or have an opinion.**
3. **An Example of a response form that may contain examples of similar concerns you have and may help you with your response. This response concentrates on Chalfont St Peter and the Green Belt.**
4. ***The following points are not for direct inclusion in the response, but it is worth using similar wording and context when making comments in your response regarding elements that are in the GREEN BELT***

*The Local Plan is considering change of land use, particularly for Green Belt areas.*

*According to the National Planning Policy Framework there are five stated purposes of including land within the green belt:*

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

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

*3 To assist in safeguarding the countryside from encroachment.*

*4 To preserve the setting and special character of historic towns.*

*5 To assist in urban regeneration by encouraging the recycling of derelict and other urban land*

*Once an area of land has been defined as green belt the stated opportunities and benefits include:*

*1 Providing opportunities for access to the open countryside for the urban population.*

*2 Providing opportunities for outdoor sport and outdoor recreation in the urban areas.*

*3 Retention of attractive landscapes and enhanced landscapes common to near where people live.*

*4 Improvement of damaged and derelict land around towns.*

*5 The securing of nature conservation interests.*

*6 The retention of land in agricultural, forestry and related uses.*

1. **The full list of questions are listed below. Feel free to also comment on any of these if you have read the documents or have an opinion.**

**Local Plan Initial Consultation Questions**

Feb 2016

|  |  |
| --- | --- |
| Question |  |
| 1 | Do you have any comments on the definition of housing and functional economic market areas being used, on the draft Buckinghamshire HEDNA or on the needs assessment work planned during the next stages of the Joint Local Plan process?  |
|  |  |
| 2 | Do you have any comments on the draft HELAA, particularly in relation to whether included sites are likely to be deliverable by 2036 and whether additional sites should be added?  |
|  |  |
| 3 | Are there existing uses/sites not currently identified in the HELAA and within the built-up areas that may be surplus to requirements or where the existing use could be consolidated or re-provided elsewhere such as open spaces, sports and leisure uses?  |
|  |  |
| 4 | Do you agree with the approach to the Joint Local Plan Vision and Objectives and if not what changes or additions do you consider are needed? Please explain your reasoning for suggesting any alterations.  |
|  |  |
| 5 | What spatial strategy option or options do you think the councils should consider and what should be the priority order? Are there any other spatial strategy options that the Joint Plan should consider and why?  |
|  |  |
| 6 | Do you have comments on individual options generally or specific settlements/site options that could be part of these options?  |
|  |  |
| 7 | Do you have comments on the suggested level of unmet needs in Chiltern/South Bucks?  |
|  |  |
| 8 | Do you have any comments or suggestions on how the councils can meet its local affordable housing need? |
|  |  |
| 9 | Do you have any comments on the above options to meet the needs of Gypsies, Travellers and Travelling Showpeople? |
|  |  |
| 10 | How do you think the Joint Local Plan can best meet specialist elderly accommodation needs, both in term of general and affordable needs? |
|  |  |
| 11 | Do you have a view on the Heritage Strategy – for example views on our local heritage assets, how heritage contributes to quality of life and our sense of place and community.? |
|  |  |
| 12 | Are you aware of any currently unprotected local heritage assets that should be identified and if so why is the heritage asset important locally? |
|  |  |
| 13 | Local Green Space designations can be made as part of the Local Plan and so local residents, community groups and other local stakeholders are asked to identify areas that they would like to be considered. Importantly any nomination should include supporting evidence. |
|  |  |
| 14 | Do you have any nominations for Local Measures? |
|  |  |
| 15 | Do you have a view on the scope of policies proposed in Appendix 7. |
|  |  |
| 16 | Do you have any comments on the Settlement Infrastructure Capacity Study, infrastructure needs or issues and CIL? |
|  |  |
| 17 | Do you have any other points you would like the councils to take into account in the preparation of the Joint Local Plan? For example are there any challenges or opportunities you think the new Joint Local Plan will need to address? |
|  |  |

1. **The exemplar below does not answer all of these questions and it is not mandatory to do so.**

**The main aim of this exemplar response is to provide comment on: *The Local Plan considering change of land use, particularly for Green Belt areas…***

**For Response Submission: An exemplar below may reflect concerns that you also have and concentrates on Green Belt issues around Chalfont St Peter.**

**Q1 HEDNA comments:**

In general there are many assumptions regarding the housing needs and assessment are frequently flawed or expressed with little or no comparative justification.

For example Figure 3: Full Objectively Assessed Need for Housing across Buckinghamshire 2013-33

An uplift of 752 households is applied to Chiltern with a reduction of 902 in neighbouring South Bucks. There is no logic to these vastly different numbers in adjoining districts and no explanation or justification is given. Indeed, for Buckinghamshire as a whole, the uplift is only 305 (0.74%) whilst that for Chiltern is 752 (16.5%). Variations of this magnitude are just not believable. There is no justification in applying this uplift and it should be reduced to 0.74% in line with the County average.

**Q4:**

Chiltern District Council has granted planning permission for over 600 dwellings within Chalfont St Peter (CSP) over the last three years in line with the previous core strategy, these include the Holy Cross site, Newland Park and the Audley Homes development at the Epilepsy site.

This previous planning activity should be recognised and adjusted for by equally reducing the new local plan numbers for CSP.

Objectives which protect the green belt and the AONB should be the priority. There is a duty to cooperate between districts and therefore development in neighbouring areas such as Aylesbury Vale District on land outside the green belt should be concentrated on. This is deliverable and would be in keeping with National Planning Policy

**Q5 and 6:**

There are numerous potential development sites and opportunities in the neighbouring authorities of South Bucks, Wycombe and Aylesbury Vale, Dacorum and Three Rivers, which are more appropriate and NOT on Green Belt land or AONB.

CDC must argue for and consider developments that occur first in land which is not Green Belt or AONB.

There has been extensive development in Chalfont St Peter (holy Cross, Newland Park) as opposed to other settlements over the past three years and Chalfont St Peter is already the biggest village in the country.

Any further development in Chalfont St Peter, particularly on the outskirts will lead to urban sprawl and will seek to merge settlements with adjoining settlements. Thus reducing the effectiveness of the Green Belt function by further encroaching on the countryside and reducing the availability of the land for agricultural, forestry and recreational activities

CDC must make more efficient use of land in the existing built up areas (not the Green Belt) and possibly reallocate open space elsewhere in the District to the Green Belt for example Open space in Chalfont St Giles (Bowstridge Lane) could have limited development as long as equivalent parts of the Green Belt are fully protected and maintained.

Brownfield sites should be developed as a first option wherever possible.

Any urban extensions of the main settlements in the District should be in our greater built up towns of Amersham and Chesham where greater elements of sustainability are present.

Limited extension should be made to areas such as Great Missenden, Prestwood and Chalfont St Giles as there are clear opportunities in these villages for development.

The policy should capture and combine all of the above, but look to spread the developments throughout and across the Districts

**Specific comments on areas in Chalfont St Peter:**

**Mill Meadow: CSP Area 1**

The area is a much used amenity facility which includes the Community Centre, a football club, recreation park, playing pitches (football and cricket), tennis courts, a scout headquarters and parish council offices.

There are no areas within the centre of the village where any of these facilities could be relocated. The Chalfont St Peter C of E Academy, adjacent to Mill Meadow, does not have a playing field within the school grounds.

The school currently uses Mill Meadow for physical education lessons on a daily basis and for team games, athletics and cross country activities. The school would be unable to deliver an effective curriculum if Mill Meadow is designated for development.

The area is also a much used public facility with a Nature Reserve, Jubilee Garden and The Lady Gibb Millennium Wood and with the ability to walk alongside the Misbourne from the Village Centre, across Mill Meadow and through to Chalfont St Giles.

These amenities are simply irreplaceable due to the length of time taken for them to develop and their very position.

Mill Meadow is on the flood plain. There is a serious risk of flooding.

**CSP Area 2** in the Sustainability Appraisal document:

Development at this location will lead to loss of Green Belt. It will encroach on features such as, hedgerows and mixed farmland.

There are a number of habitats present here including mature hedgerows, rough grassland etc all of which are essential characters that should remain as Green Belt and would be lost following any development.

The area is clearly not sustainable for transport and other infrastructure deficit reasons. Where only car use would be feasible which would lead to increased congestion and pollution.

Sewage and water supply large expansion here would lead to sewage issue further down the valley.

A useful recreational social area is currently located on the site which is well frequented and provides much needed facilities for young people to socialise in.

**The Epilepsy Society site (“ES Site”): CSP Area 3** in the Sustainability Appraisal document: SA\_Jan\_16\_options\_with\_Appendix\_A.pdf found at: http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7791&p=0

Firstly it is important to point out that data in this report is Erroneous. This has been reported to the CDC planning office separately. The Pre-mitigation Assessment Matrix summary in Table 5.1 on document page 146 is wrong.

It shows matrix content from other areas than those the table associates the data with. Data for GC1 is wrongly associated with CSP3 in this table.

CSP area 3 is very large. Over half of the area is more than 400m from any bus stop. There are no better road routes to other areas ie it is the same as CSP area 2, where both areas have restricted access through small single lanes to the Mill End housing estate and both feed the same congestion on the A413. The assessment made for Transport for CSP area 3 has been assessed as a +, when clearly it should be a –

CSP Area 3 is currently a Major Developed Site (“MDS”) within the green belt and there are already two new care home developments currently in progress.

It provides important recreational facilities with nine football pitches plus a pavilion with toilets, showers and changing facilities which are used by more than 24 teams.

Consider a line dividing the North and South of the area. The area to the south of Tate Road and Micholls Avenue has the current built up area (“ES South”) being one and the area to the north of that line including (for this purpose) comprises the Model Farm, Rowan’s nursery and Brawlings Farm. (“ES North”).

ES North is within the Colne Valley Park and therefore deserves special protection.

ES South is currently used for care home and medical facilities and should be retained as such. It is an ideal site to provide further care home and/or medical facilities for CSP.

The ES Site fulfils, as a whole, all five of the stated purposes of the green belt and in particular provides an important buffer between the settlements of Chalfont St Giles, Chalfont St Peter and Horn Hill.

The ES Site contains important open views from Chesham Lane towards the Colne Valley Park.

It provides important agricultural, forestry and related employment uses and opportunities for outdoor sport and recreation, including the Model Farm, Rowan’s Nursery and Brawlings Farm Riding Centre.

It is inherently unsustainable, a fact that was established through the NSE planning inspectorate appeal case in June 2005; it is not served by any appropriate bus service and is too far to walk to either Little Chalfont or Gerrards Cross which are the nearest rail stations.

Any development therefore requires increased car dependency.

The ES Site is bounded on three sides by narrow, unlit and dangerous country lanes, without pavements, which make it even more unsuitable for development.

The ES North site should be retained in the green belt and Colne Valley Park with no development.

ES South should be retained as an MDS in the green belt for medical/care home use. The sheer size of this proposed development site is clearly excessive and could potentially double the number of dwellings in CSP.

Several local businesses use the ES site apart from the agricultural use.

The ES Society is one of CSP’s largest employers.

**The area identified for industrial development to the east of the A413**:

The area is in The Colne Valley Park and is identified as being a particularly important green space for biodiversity and environmental priorities.

The area is within the Green Belt and provides the important function of separating the built-up areas of CSP and Tatling End, Gerrards Cross and Denham.The A413 is a natural barrier for development.

To build to the east of it would erode the barrier and facilitate yet more development in the future on the open space to the east.

The area is in a flood plain.

The area is valued by residents and visitors as a green corridor and to destroy it would inevitably lead to further industrialisation and amalgamation of separate and distinct developed areas.

**Q8:**

Developments of flats should generally be avoided and any affordable housing, the need for which is considerably overstated, should be built in town’s centres or within walking distance of a railway or tube station and never on the edge of villages or in the Green Belt

**Q9:**

Traveller’s sites should not be concentrated in Chalfont St Peter but dispersed more evenly throughout the District

**Q16:**

Chalfont St Peter has an inadequate drainage system. No further significant development should take place in CSP without a major re-construction of the sewage system. If the Newland Park development proceeds, road and utilities need to be urgently improved. Schooling remains a problem made worse by CDC’s highly questionable decision to allow the Holy Cross to close. Allocating educational land for housing increases the shortage of school places in Chalfont St Peter already incapable of sustaining planned developments. Proper provision for school places needs to be considered as there is no room for further expansion at the Community College and there are clear site restrictions at the Academy school.

**Q17:**

The Green Belt is seriously under attack and seen as an easy target for development. This must be avoided at all costs to aid biodiversity, encourage wildlife, decrease pollution and reduce the effects of climate change for future generations.

Major Developed Sites that are currently in the Green Belt should remain in the Green Belt and the Core Strategy policies adopted in relation to these areas should be maintained.

It should be a condition of any redevelopment of Green Belt sites that current use and scale of the site is maintained. In particular the Epilepsy Society site in Chesham Lane where building on that site should be allied to care home and medical use only with no loss of Green Belt area. Importantly retaining playing fields and maintaining green open space on that site.

Similarly any redevelopment of Newlands Park must bear in mind well defined sustainability issues. Redundant buildings on developed Green Belt should be redeveloped appropriately in accordance with the previous policies on that site, and with no greater footprint than at present.

It is crucial to maintain the character and openness of the entire development.

The Local Plan should disperse housing sensibly throughout the District with affordable housing in appropriate places and housing required only to meet established local needs.

The London (Metropolitan) Green Belt performs a crucial function, especially in Chalfont St Peter where CDC should protected the Green Belt further by specifically allocating policies to maintain and invest in it despite any pressure it may be under.

Generally any developments should be focused on Brownfield sites and town centres as a result