**DRAFT**

(N.B. The paragraph numbers are for convenience only and do not refer to any questions asked in the Local Plan documentation.)

I am lodging an objection to the proposals in the Local Plan to change the land use of Green Belt areas in Chiltern District. About 70% of Chiltern District is within the Chilterns Area of Outstanding Natural Beauty (AONB), an area of distinctive landscape with special qualities which is of national importance. There are many elements which give the Chilterns landscape its distinctive and varied character. These include broadleaved woodland of beech and other species, chalk grassland, hidden valley systems, chalk streams, ancient and sunken lanes, vernacular buildings in brick, flint and dark timber, historic parks, gardens and other items of cultural heritage and wildlife. A high degree of protection is given to the AONB by planning policy at all levels national, regional, county and local. The purpose is to conserve and enhance natural beauty which includes wildlife as well as landscape features. This is reflected in Local Plan policy LSQ1.

The Council is a member of the Chilterns Conservation Board which has an active role in co-ordinating and initiating policies and actions across the AONB. This partnership comprises all the local authorities lying within the AONB together with the Countryside Agency, other relevant Government agencies and amenity organisations. All are committed to conserving the special character of the Chiltern Hills. They need to reflect this commitment in their consideration of these proposals and reject them.

1. According to the National Planning Policy Framework (NPPF), 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 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.

The Green belt being considered for reclassification currently fulfils all of the above purposes and should remain as Green Belt.

1. The Epilepsy Centre North (ESN, covering the Model Farm, Shire Horse Centre, Brawlings Farm and Rowan Nurseries) is within the Colne Valley Park and therefore deserves special protection as part of that park. It is also inherently unsustainable as it is a long walk to the nearest bus stop and services are limited and infrequent. Any development would be car dependent and the site is bounded on three sides by narrow and dangerous country lanes which already handle unacceptably heavy traffic volumes. The sheer scale of this area is clearly excessive and would more than double the number of dwellings in Chalfont St Peter (CSP) with an impact on services which could not be met. Chiltern District Council Planning Policy GC3 states that in considering proposals for development throughout the District, the Council will seek to achieve good standards of amenity for the future occupiers of that development and to protect the amenities enjoyed by the occupants of existing adjoining and neighbouring properties. Where amenities are impaired to a significant degree, planning permission will be refused. Clearly development on this land fails to meet these criteria and should remain as Green belt.
2. The area south of this on the EC site (ECS) should be retained for medical, care home and sheltered housing use only.
3. Paragraph 74 states that existing open space, sports and recreational buildings and land should not be built on unless these are surplus to requirements, to be replaced or the development is for alternative sports and recreational facilities. Planning authorities must positively plan for provision of shared space, community facilities and local services and amenities. The NPPF aims to protect and enhance open space, public rights of way and community and recreational facilities. It would be hard to contrive a plan which does more damage to these facilities than what is being proposed. CSP would be left with almost no recreational facilities. Numerous pitches would be lost at the Epilepsy Centre (EC), Newlands Park and Mill Meadow. CSP football club, tennis club, cricket club and Gerrards Cross Golf Club would close. The cricket club and golf club would both lose their clubhouses and car parks. The cricket club would lose most of its pitch and the golf club a large part of the course, rendering it unsustainable and forcing its closure with the loss of over twenty jobs.CDC is required to consult Sports England about any developments which affect leisure facilities. No report from Sports England is included on the CDC web-site.
4. Much of the proposed developments will impact the Chilterns AONB, particularly on the northern, Chalfont Common, edge of the village. The proposals will lead to loss of Green Belt and encroach on those features identified in the character assessment such as mixed farmland, areas of ancient woodland and the hedgerow network in particular. It will also lead to urban sprawl and will effectively link CSP to Chalfont St. Giles with little remaining separation from Little Chalfont and Maple Cross.
5. Chiltern District Council’s Policy GC12 states that “any development which will detrimentally affect the character of the District's rivers, river banks or land in the vicinity of a river, particularly where the development impinges visually on the riverside landscape, will not be permitted. The term "river" includes any adjoining marshland, or other related water feature.

This Policy applies to the River Chess and River Misbourne. Where development is acceptable in accordance with this Policy, planning permission will be granted provided that other Policies in this Local Plan would also be complied with.” The employment zone being proposed to the north of the A413 clearly does not meet these criteria and should remain classified as Green belt. It lies in a category 3 Flood Zone around the River Misbourne and has flooded frequently in recent years. The area is in The Colne Valley Park and is a particularly important green space for biodiversity and the environment. It separates CSP from Tatling End, Gerrards Cross and Denham. The plan states that there are two train stations located within 1km of the site, Denham and Denham Golf Club, distances being measured as the crow flies. Even using this method, the closer of the two (Denham Golf Club station) is some two miles and, by road, 6.7 miles. In any case, the Plan states that there is no requirement for additional employment land through to 2036 so this area should remain as Green belt.

1. Chalfont St. Peter (CSP) has already taken more than its fair allocation of development and is set in the Plan to take the largest single percentage of the development proposed for Chiltern District as a whole.
2. The Plan projects future population growth in CDC from historical trends to give an increase in population from 92,000 in the 2011 Census to 101,200 in 2036, an increase of 10% over 25 years. These figures are derived from a report published by the Department of Communities and Local Government which is itself based on figures published by the Office of National Statistics (ONS) (see Tables C and D). These same Departments forecast that the number of persons per household will decrease from 2.5 in 2011 to 2.35 in 2036 (see Table D). The population of Chiltern is forecast to increase by 8,548 in the period 2011 – 2036, Applying the person per household (PPH) figure of 2.35 gives a requirement of 3,606 new homes and not the 4,552 used in the Plan which assumes a persona per household of 1.88. Given historic trends it is inconceivable that it will drop that far in 25 years.
3. The projections then apply various adjustment factors (see Table A). A large part of this is double counting as, by definition, an extrapolated historic trend includes such factors as birth and death rates, migration into the area etc. Further adjustment should only be made in extreme circumstances and as a result of identifiable and quantifiable factors. Chiltern District has had an uplift of 752 households applied (16.5%) based on a 10 year migration trend yet, in their report “Migration and other drivers of population change”, which is again based on figures from the ONS, the Research Team of Buckinghamshire County Council states that “migration has fluctuated in the last 10 years and is difficult to predict. The last 5 years have seen Buckinghamshire gain on average 1,700 persons per year as more people are moving into the county than are leaving. Migration is comprised of within-UK migration and overseas migration. Around 20% of Buckinghamshire’s annual net migration comes from overseas migration with the majority, 80%, from people moving into the county from elsewhere in the UK. In the future annual net migration is projected to increase from 2013/14 until 2016/17 to almost 3,700 people by 2016/17. By 2018/19 the annual net migration figure is projected to have fallen to 1,700 people”.

Apart from a higher migration rate in the four years from 2013/2014 to 2016/ 2017, three of which are already included in the base figure, the future rate of net migration is forecast to remain at historic levels. Indeed, this same report states that Chiltern and South Bucks are projected to have more people leaving to go overseas than coming into these districts and that their projected net differences between births and deaths are similar and will contribute only a small increase of 100 over the Plan period (see Table B) The report by Opinion Research Services (ORS) “HMAs and FEMAs in Buckinghamshire”, published in January 2016 cannot identify any inward migration to Chalfont St Peter, so small are the numbers.

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.

1. The HEDNA also considers market signals based on lowest quartile house prices and applies as a result an uplift of 20% due to “price pressure”. The assumptions on which this is based are fatally flawed because they are based on a statistical comparison without taking into consideration the type of properties concerned. Chiltern has few flats or small houses and many very large properties with correspondingly high prices. 76.9% of properties in Chiltern are owner occupied compared to 63.4% in England as a whole, another factor which will tend to give higher prices. There were only 171 properties sold in Chalfont St Peter in 2015, a very small database from which to extrapolate any meaningful conclusions. Again, there is no justification in applying this uplift and it should be removed.
2. The ORS / Atkins HEDNA Report of January 2016 states that “Based on the conclusions about future jobs, the overall increase in employment is likely to yield 33,400 extra jobs in the Buckinghamshire HMA over the 20-year period 2013-33” but it gives no explanation of where these will come from. There is little doubt that there will be an increase in the Plan period but, again, increases of this magnitude are not believable and should be reduced to the historic average.
3. The final uplift is for affordable housing. Again, this is double counting as the forecast uplift in households allows for this. It is part of the overall figure. It again should be removed.
4. CSP, with a population of 13,000, is already the largest village in the country. Approved developments will increase the population by 1,440 (11.1%). CSP is already bearing more than its proportionate share of development, not just for housing but for traveller sites also where far too many are being suggested. These must be dispersed more evenly across the district.
5. Sustainable distances to facilities and amenities (Barton et al, 2010) are set as:

Target distance Maximum distance

Local park/greenspace 400m 600m

Leisure centre 1.5km 2km

Doctor’s surgery 800m 1km

Hospital 5km 8km

That part of the village north of the A413 fails to achieve all but the first of these targets. To satisfy the proximity to a hospital for the whole of CSP, Chalfonts and Gerrards Cross Hospital is used. The range of services offered there falls well short of any reasonable definition of a hospital with Amersham being the nearest at some 9.7km miles away.

1. The Infrastructure Delivery Plan (IDP) flags up numerous critical areas in CSP. There is no further sewerage capacity and drinking water is at its limit. The measures to counteract this amount to rationing and restrictions on the use of domestic appliances.
2. There are no school places available and the report shows that the County is short of places by . Hopefully the ruling on the mix of buildings on the Holy Cross site will include a new school so that the existing Middle School site in the centre of the village can be developed as affordable housing.
3. No report from health providers has yet been included in the IDP but villagers already face long waits for a doctor’s appointment. The pressure which will result from the 600 houses already approved, mostly still to be built, will push all of these services over the edge. No further approvals should be granted until an infrastructure is in place to cope with the projected demand to at least 2050.
4. The only road in the area which is considered in the IDP is the A413 which the South Bucks District Transport Strategy (2010) states is highly congested. Other roads around the village, most very narrow, are not considered but there is already significant queuing at peak periods. These narrow lanes are used as rat runs to avoid this congestion, a purpose for which they were not designed and are not capable of handling. All roads in the area are in a disgraceful state of repair and can best be described as a succession of potholes joined up by worn tarmac. I travel extensively in the UK and our roads are the worst I have encountered in the UK. Public Transport is total inadequate. Indeed, in the 2001 and 2011 census only 171 (1.4%) and ( %) people respectively travelled to work by bus.
5. The building of HS2 will impact significantly on the village with, as yet, unknown long term consequences but it significantly damage the Green Belt and air quality whilst giving no benefit to local householders. In the short term, whilst it is being built, the huge influx of workers will impact on health care and increase the volume of traffic.
6. Affordable housing should only be in the village centre of Chalfont St Peter(CSP) as it is the only area with viable public transport. The range of existing services and their frequency would make it impossible for someone without a car to commute to any of the surrounding villages by public transport.
7. Building, whether for housing or employment use, should be on brownfield or infill sites only.
8. Approval has already been given for the construction of some 600 new houses in CSP and these do not appear to have been subtracted from CSP’s future numbers. An increase of 4,552 households is used in the Plan for Chiltern giving, with 14% of the population, 637 for Chalfont St Peter. Existing approvals have already met CSP’s share of new housing. Indeed, the figure of 4,552 is based on an occupancy of 1.88 rather than 2.35 (see 8 above). This latter figure would give only 3,606 new homes and 509 for CSP. Given that there are bound to be some infill approvals in the Plan period, CSP has met its share of new housing from existing approvals and there is therefore no need for Green Belt land around the village to be reclassified.

**Table A - Household Projections (from ORS / Atkins HEDNA Report, Jan 2016)**

|  |  |  |
| --- | --- | --- |
|  | **Chiltern** | **South Bucks** |
| Demographic starting Point  | 4,552 | 6,522 |
| 10 year Migration Trend | 752 | -902 |
| Balance of workers/ jobs |  |  |
|  | 5,304 | 5,620 |
| Transactional vacancies | 39 | 201 |
|  | 5,541 | 6,077 |
| Balance workers/ jobs | 818 | 873 |
| 20% market uplift | 1,061 | 974 |
|  | 6,602 | 7,051 |
|  |  |  |
| % increase | 45% | 8% |
|  |  |  |
| **Market Housing Need** | **6,200** | **6,200** |
|  |  |  |
| Affordable Housing Needs | 1,100 | 1,600 |
|  |  |  |
|  | 7,300 | 7,800 | 7,800 |
|  |  |  |
| % increase | 60% | 20% |

**Table B: Births by District 2001, 2011, 2013, 2018 and 2026**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Area**  | **2001** **Births**  | **2011** **Births**  | **2013** **Births**  | **2018** **Projected Births**  | **2026 Projected Births**  |
| Aylesbury Vale  | 1,907  | 2,232  | 2,163  | 2,339  | 2,293  |
| Chiltern  | 942  | 921  | 854  | 881  | 835  |
| South Bucks  | 624  | 724  | 780  | 708  | 650  |
| Wycombe  | 1,990  | 2,256  | 2,212  | 2,183  | 2,136  |
| **Buckinghamshire**  | **5,463**  | **6,133**  | **6,009**  | **6,111**  | **5,914**  |

**Table C - Number of people in county and district areas by age group**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  |  | **2001** | **2011** | **2013** | **2018** | **2026** | **2036** | **% increase** |
|  |  |  |  |  |  |  |  | **2013-2036** |
|  |  |  |  |  |  |  |  |  |
| **Bucks (a)** | **Total**  | **479,024** | **506,550** | **514,700** | **534,600** | **566,000** | **597,800** | **16.1** |
|  | 0 – 19 | 122,973 | 127,043 | 128,200 | 132,400 | 140,300 | 140,500 |  |
|  | 20 – 64 | 286,376 | 294,564 | 294,600 | 298,900 | 301,800 | 30,440 |  |
|  | 65+ | 69,675 | 84,943 | 91,700 | 103,400 | 123,800 | 152,800 |  |
|  |  |  |  |  |  |  |  |  |
| **Aylesbury**  | **Total**  | **165,760** | **174,880** | **179,700** | **189,700** | **204,700** | **218,800** | **21.7** |
| **Vale** | 0 – 19 | 43,975 | 44,323 | 45,100 | 47,000 | 50,700 | 50,900 |  |
|  | 20 – 64 | 100,487 | 104,249 | 105,500 | 108,700 | 111,000 | 112,400 |  |
|  | 65+ | 21,298 | 26,308 | 29,000 | 34,100 | 43,100 | 55,400 |  |
|  |  |  |  |  |  |  |  |  |
| **Chiltern** | **Total**  | **89,237** | **92,652** | **93,000** | **94,200** | **97,500** | **101,200** | **8.8** |
|  | 0 – 19 | 22,155 | 23,351 | 23,200 | 23,600 | 24,500 | 24,200 |  |
|  | 20 – 64 | 52,048 | 51,188 | 50,100 | 49,500 | 48,800 | 48,600 |  |
|  | 65+ | 15,034 | 18,113 | 19,400 | 21,100 | 24,100 | 28,400 |  |
|  |  |  |  |  |  |  |  |  |
| **South Bucks** | **Total**  | **61,937** | **67,060** | **67,900** | **71,100** | **76,500** | **82,100** | **20.9** |
|  | 0 – 19 | 14,955 | 15,845 | 15,900 | 16,700 | 18,200 | 18,200 |  |
|  | 20 – 64 | 36,139 | 38,139 | 38,000 | 38,800 | 39,600 | 40,600 |  |
|  | 65+ | 10,842 | 13,076 | 14,000 | 15,300 | 18,700 | 23,700 |  |
|  |  |  |  |  |  |  |  |  |
| **Wycombe** | **Total**  | **162,106** | **171,958** | **174,200** | **179,500** | **188,300** | **195,800** | **12.4** |
|  | 0 – 19 | 41,898 | 43,524 | 44,000 | 45,100 | 47,100 | 47,000 |  |
|  | 20 – 64 | 97,701 | 100,988 | 100,900 | 101,700 | 102,300 | 102,800 |  |
|  | 65+ | 22,507 | 27,446 | 29,400 | 32,800 | 38,000 | 45,800 |  |

**2001 and 2011 – Census**

**2013 – 2036 – Office for national Statistics, May 2014**

**Table D – CLG Household Projections to 2036 and Derived Persons/ Household**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **1991** | **2001** | **2011** | **2013** | **2016** | **2018** | **2026** | **2036** |
|  |  |  |  |  |  |  |  |  |
| **Bucks (b)** | 173 | 188 | 201 | 205 | 211 | 216 | 232 | 252 |
| Increase  |  |  |  |  |  |  |  |  |
| 1991-2016 | 38 (22%) |  |  |  |  |  |  |  |
| 2016-2036 | 41 (19.4%) |  |  |  |  |  |  |  |
| **Persons per household (a/b)** |  | **2.77** | **2.69** | **2.52** | **2.51** | **2.53** | **2.62** | **2.37** |
|  |  |  |  |  |  |  |  |  |
| **Aylesbury**  |  |  |  |  |  |  |  |  |
| Increase | 55 | 65 | 70 | 72 | 75 | 77 | 84 | 92 |
| 1991-2016 | 20 (36.4%) |  |  |  |  |  |  |  |
| 2016-2036 | 17 (22.7%) |  |  |  |  |  |  |  |
| **Persons per household (a/b)** |  | **2.55** | **2.52** | **2.51** |  | **2.48** | **2.44** | **2.37** |
|  |  |  |  |  |  |  |  |  |
| **Chiltern** |  |  |  |  |  |  |  |  |
| Increase | 34 | 35 | 37 | 37 | 38 | 38 | 40 | 43 |
| 1991-2016 | 4 (11.8%) |  |  |  |  |  |  |  |
| 2016-2036 | 5 (13.2%) |  |  |  |  |  |  |  |
| **Persons per household (a/b)** |  | **2.55** | **2.50** | **2.52** |  | **2.48** | **2.41** | **2.35** |
|  |  |  |  |  |  |  |  |  |
| **South Bucks** |  |  |  |  |  |  |  |  |
| Increase | 24 | 25 | 27 | 27 | 28 | 29 | 31 | 35 |
| 1991-2016 | 4 (16.7%) |  |  |  |  |  |  |  |
| 2016-2036 | 7 (25.0%) |  |  |  |  |  |  |  |
| **Persons per household (a/b)** |  | **2.48** | **2.48** | **2.52** |  | **2.37** | **2.26** | **2.35** |
|  |  |  |  |  |  |  |  |  |
| **Wycombe** |  |  |  |  |  |  |  |  |
| Increase | 60 | 64 | 68 | 70 | 71 | 72 | 77 | 82 |
| 1991-2016 | 11 (18.3%) |  |  |  |  |  |  |  |
| 2016-2036 | 11 (15.5%) |  |  |  |  |  |  |  |
| **Persons per household (a/b)** |  | **2.53** | **2.53** | **2.48** |  | **2.49** | **2.41** | **2.39** |

**Table E – 2001 and 11 Census, ONS**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **2001** |  | **2011** |  | **2001 – 2011 increase** |
| **Buckinghamshire** | 479,100 |  | 506,550 |  | 5.7% |
| **Chiltern** | 89,226 | 18.6% of Buckinghamshire | 92,652 | 18.3% of Buckinghamshire | 3.8% |
| **Chalfont St Peter** | 12,939 | 2.7% of Buckinghamshire and 14.5% of Chiltern | 12,766 | 2.5% of Buckinghamshire, 13.8% of Chiltern | (1.3%) |