

## Things You May wish to Include in Your Objection

### Consultation Closing Date – 23<sup>rd</sup> May 2024



Please find below some thoughts and ideas for objection points you may wish to put into your document which must reach the council before May 23<sup>rd</sup>. There are a number of errors, inconsistencies and questionable statements made by the applicant.

Pell Frischmann, the traffic and transport consultants to the Applicant, have responded in detail to part of the SENSE submission of February 2023. Apart from the technical detail, they make two particularly contentious claims that you may wish to comment on:

1. Failing to include Misbourne Avenue in the strategic traffic model used to assess impacts '*... is not considered to make any overall difference to the likely traffic distribution from the site and in fact means that a more robust situation is considered ...*'. Clearly this is nonsense logically, but missing the link also means that it hasn't been evaluated for its own capacity and that of its junction with the A413. Remember that upwards of 2,500 cars may be flowing out of this site.
2. '*Gorelands Lane is generally around 5m in width and therefore suitable for two cars to pass each other along the majority of its length.*' Again this is inaccurate, particularly with regard to the section to the west of Chesham Lane that is on the 'desire line' from the site to Little Chalfont and Amersham-on-the-Hill. Much of Gorelands Lane is not 5m in width and two cars cannot pass along the majority of its length.

#### Examples of possible responses to the revised Strategic Design Code (SDC):

- The revised Strategic Design Code fails to adequately address the legitimate concerns raised in the Landscape Architecture & Urban Design (LAUD) Team's report (15.03.24), these concerns remain relevant. In addition, LAUD highlights several errors and incorrect statements made by the applicant.
- Paragraph 133 of the NPPF, states that design codes can provide a framework for '*creating beautiful and distinctive places with a consistent and high-quality standard design*'. The Epilepsy Society's Design Code fails to achieve this on many counts.
- 3-5 storey properties are excessive in the location and totally out of keeping with the design and density of existing housing stock in Chalfont Common. The letter from Deloitte dated 28/03/24 states the development '*has been sensitively designed to complement and respond to the existing area's height and character*'. This is nonsense.
- The letter from Deloitte also states that regard for the Chalfont St Peter Neighbourhood Plan is not required as it is more than 5 years old. This is inaccurate, the CSP adopted Neighbourhood Plan has been validated to 2028.
- The revised masterplan fails to show sufficient provision for parking on the site. The minimum parking stipulation in both national and Bucks's planning policies does not reflect the location of this site and the topography of Chalfont St Peter. It is not unreasonable to presume that all households will own at least one car as our village centre shops, medical facilities, churches, day nurseries, secondary school and rail link are on the opposite side of a steep valley. Public transport is sporadic and will not meet the needs of residents, particularly pupils travelling to the local secondary school.

- Off-street parking provision to accommodate EV charging points is woefully inadequate. Eventually all vehicles will require access to an overnight electrical charging point. Roadside or communal parking lots cannot provide this facility chargeable to individual households.
- The applicant has provided no material evidence to support the need for an additional two-form entry primary school on the site, or that Bucks Council is willing to partially or wholly fund the build and running costs. If the Local Authority decides not to locate a new school on the site, the number of playing fields provided by the developer would fail to meet Sport England's stipulation. With falling roles and a restriction on accepting out of catchment area pupils, it is likely that an expansion of Robertswood School could adequately accommodate any additional primary aged pupils moving to the Epilepsy Society's development.
- Three of the proposed playing pitches are located within the new school grounds. Even if a school is built by the local authority, public use of these pitches and staff car park at the weekends would be a security risk to school property and cannot be guaranteed.

Other references you may wish to comment on:

- The applicant has demonstrated that meeting the Government's affordable housing requirement for new developments is not viable on this site due to the high cost of property in the area. As a result, the applicant will be required to purchase pockets of land and commit to providing a shortfall of 650 dwellings elsewhere. This will significantly reduce the applicant's return on the development and undermines their case that the proceeds will finance desirable research projects.
- The application does not account for the additional traffic and pressures on local infrastructure caused by the yet to be occupied Newland Park development and the proposed David Lloyd fitness centre.
- Denham airport have again written and objected to the proposed development. Spring Green Planning on behalf of Bickerton Aerodromes have pointed out a number of errors in the document from the applicant. These include the fact that the applicant did not take into account the Denham Airport Safeguarding Plan formally accepted by the Buckinghamshire Council

**Finally and most importantly:**

The applicant's claim that its poor financial position meets the 'Very Special Circumstances' required to remove land from the Green Belt is unsound, as evidenced in their own accounts. The application fails to meet any of the identified criteria in sections 154 and 155 of the National Planning Policy Framework (NPPF) (December 2023). The applicant's *desire* to pursue epilepsy research fails to outweigh the significant harm to the Green Belt and the development would substantially impact on the openness of the site. Especially as considerable investment has been made to medical research facilities elsewhere. The proposal constitutes a major residential-led urban extension to Chalfont St Peter which would encroach into surrounding countryside to the extent that will result in major adverse impacts on local landscape character and upon visual amenity from public roads and rights of way. In addition, it would also reduce the rural gap between Chalfont St Peter, Chalfont St Giles and the Horn Hill settlement.