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Site Appraisal

*of*

Draft Allocation: Policy SP BP6

*concerning*

Land at Little Chalfont

*Prepared for*

**Little Chalfont Parish Council**

July 2019



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## 1 Executive Summary

1.1.1 Little Chalfont Parish Council has instructed Michelle Bolger Expert Landscape Consultancy (MBELC) to prepare an appraisal of the land covered by proposed Policy SP BP6 (BP6) within the Draft Chiltern and South Bucks Local Plan 2036 Publication Version (Draft Local Plan). BP6 covers 45.8 hectares (ha) of land<sup>1</sup> to the south-east of Little Chalfont and is proposed to be allocated for 700 homes, a primary school and 15 pitches for Gypsies and Travellers.

### 1.2 Landscape Context

1.2.1 BP6 is located immediately adjacent to the Chilterns AONB whose special qualities are set out in the AONB Management Plan. The attributes of the site, including the chalk valley landform and ancient woodland create a deeply rural landscape setting to the village, as well as providing priority habitat. These attributes are consistent with valued characteristics of the AONB and as such the site is considered to be a valued landscape in respect of NPPF paragraph 170a.

1.2.2 Although the site is surrounded by development on plan, in reality this development has a limited presence due to its low density and treed/wooded character. Lodge Lane on plan appears to form a boundary separating the site from the wider AONB landscape. However, due to its undulating character, and the adjacent beech woodland and pasture, it is in fact a feature characteristic of the Chilterns AONB.

1.2.3 BP6 and its immediate context are highly representative of the description of Landscape Character Area (LCA) 18.3 Little Chalfont as almost all of the key characteristics are displayed within the site. A number of Landscape Guidelines for LCA 18.3 are applicable to BP6, including the conservation and management of '*the mosaic of woodland and farmland which is key to retaining a rural character between settlements*' and the conservation of the '*character of rural roads*'<sup>2</sup> (such as Lodge Lane).

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<sup>1</sup> Draft Chiltern and South Bucks Local Plan 2036 - Publication Version Page 171

<sup>2</sup> Chiltern District Landscape Character Assessment, October 2011 Page 95

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- 1.2.4 The parts of the village which adjoin the western boundary of BP6 are within the Burtons Lane to Doggetts Wood Lane Area of Special Character which is an area that is recognised for its distinctive low-density pattern and mature vegetation, and whose character is particularly vulnerable to change. BP6 is therefore sandwiched between the AONB to its east and an Area of Special Character to its west.
- 1.3 Draft Local Plan Evidence Base**
- 1.3.1 BP6 has been considered within a number of relevant evidence base studies which have consistently identified constraints and sensitivities to development. The Chilterns Conservation Board’s Position Statement regarding development affecting the setting of the AONB identifies how significant or abrupt changes to landscape character, particularly where they are originally of a similar character to the AONB, can result in adverse effects on the natural beauty and special qualities of the AONB.
- 1.3.2 The Capacity Assessment identifies that BP6 is representative of the immediately adjacently AONB and that other constraints include existing trees and woodlands, the rural character of Lodge Lane, and the dry valley landscape. In an attempt to address these constraints, the Capacity Assessment identifies five ‘preferred access’ routes into the site and four discrete ‘proposed development areas’. It considers these might accommodate between 547-638 dwellings at a density of 30-35 dph - which is significantly less than the 700 sought by Draft Policy BP6. This level of development is also in conflict with the Capacity Assessment where it states, *‘the key landscape and visual characteristics must be retained and enhanced’* as BP6’s valued characteristics will not be retained if they are surrounded by development let alone enhanced.
- 1.3.3 Additional sensitivities not identified within the Capacity Assessment include the identification of highly sensitive HLC types (Ancient Woodland) within the site and the Objective in the Buckinghamshire Green Infrastructure (GI) Delivery Plan to Provide *‘enhanced physical access, landscape and habitat connectivity to the principal chalk valleys, and to enhance the landscape setting of the settlements/protect valley landscapes’*.<sup>3</sup>

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<sup>3</sup> Buckinghamshire Green Infrastructure Delivery Plan Page 31

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- 1.3.4 The Sustainability Appraisal of the Draft Local Plan identifies that development in accordance with Policy SP BP6 would result in a moderate negative impact overall, which is the second highest/most harmful level. Methodological concerns with the Capacity Assessment and Sustainability Appraisal have been identified, in particular the approach to assessing value.
- 1.4 Green Belt Assessments**
- 1.4.1 BP6's contribution to Green Belt purposes has been assessed as part of the local plan evidence base. The process by which the preferred green belt options were decided was overly complicated. As a consequence, the process is difficult to follow and some of the important judgements that have been made along the way are not transparent.
- 1.4.2 At a macro scale, the 'Chilterns Wedge' Green Belt area, within which BP6 is located, was found to play a 'strong' role in meeting Green Belt Purposes 1, 3 and 4, and a 'very strong' role in meeting Purpose 2.
- 1.4.3 General Area (GA) 35 (which covered essentially the same area as BP6) scored 'medium' overall against GB purposes in the Green Belt Assessment Part One. However, by the assessment's own methodology GA35 should have scored at least 4 against purpose 3 and should therefore have been discounted from the assessment process.
- 1.4.4 Parcel 2.10 (the same area as GA35) scored moderately well against Purpose 3 in the Green Belt Assessment Part Two and less well against the other purposes. The Part Two Assessment is considered to have exaggerated the influence of the existing buildings within BP6 and those of the neighbouring village, leading to an inaccurate description of the site's character as 'urban fringe'.
- 1.4.5 Exceptional circumstances were considered to exist for the release of BP6 from the Green Belt despite it contributing positively to safeguarding the countryside from encroachment. This is contested by Buckinghamshire County Council (BCC) who have stated that BP6 performs '*well in terms of Green Belt purposes and should remain Green Belt land.*'<sup>4</sup>

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<sup>4</sup> Representations on the Green Belt Preferred Options Consultation Document - POLate029 Page 4.

## 1.5 Key Landscape Constrains and Potential Impacts

1.5.1 This appraisal has identified a number of constraints to development within the BP6 site. As a result of these constraints it is considered that 700 dwellings could not be satisfactorily accommodated on the site without significant landscape harm, as it would:

- Remove 45.8ha<sup>5</sup> of land from the Green Belt which currently makes a positive contribution to the purposes of the Green Belt by safeguarding the countryside from encroachment.
- Harm both the setting of the AONB and views from the AONB by removing the buffer of open land that separates the AONB from Little Chalfont and which provides an appropriate setting for the AONB through the continuity of landscape character across the AONB boundary into BP6.
- Harm the rural character of Lodge Lane due to development in close proximity to it, the traffic generated by 700 new homes, and the infrastructure/upgrades required to accommodate it.
- Result in the loss of an attractive, mostly rural landscape which contributes positively to the setting of Little Chalfont, the AONB and the wider countryside.
- Introduce development into the dry chalk valley and be at odds with the village's characteristic development pattern which avoids valley landscapes.
- Detract from the current rural setting to the woodlands which are characteristic of the local landscape and include Ancient Woodlands which are identified as having a high sensitivity as part of the Ancient Woodlands HLC type.
- Result in BP6 being removed from the Rolling Farmland Landscape Type.
- Be contrary to the strategy and vision set by the Landscape Assessment 2011 for LCA 18.3 as it would not conserve and enhance the woodland and farmland '*which contributes to the rural, peaceful character of Little Chalfont Rolling Farmland*'.
- Be at risk of harming characteristics of LCA 18.3 such as '*Stretches of lanes/roads through open farmland or enclosed by woodland which retain a rural character*' which are identified as being sensitive to change.

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<sup>5</sup> This is the area of the BP6 site as stated in the Draft Chiltern and South Bucks Local Plan 2036 - Publication Version Page 171

- Result in a form and density of development that is uncharacteristic and unsympathetic to the Burtons Lane to Doggetts Wood Lane Area of Special Character.
- Be difficult to access without causing substantial harm to the character of Burtons Lane and/or Lodge Lane, the neighbouring AONB/Area of Special Character, and the dry valley landscape.
- Require a greater area of land and/or a higher density of development than was anticipated in the Capacity Assessment to achieve 700 homes.
- Directly impact upon woodland habitats within the site, which include two areas of Ancient Woodland and other deciduous woodland that is identified as Priority Habitat.

## **1.6 Overall Conclusion**

- 1.6.1 In landscape terms BP6 is considered to be unsuitable for residential development as it would result in significant landscape and visual harm and be at risk of harming components within the landscape which hold high landscape and ecological value.

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## 2 Introduction

### 2.1 Introduction

2.1.1 Little Chalfont Parish Council has instructed MBELC to prepare an appraisal of the land covered by proposed Policy SP BP6 (BP6) within the Draft Chiltern and South Bucks Local Plan 2036 Publication Version (Draft Local Plan). BP6 covers 45.8ha of land to the south-east of Little Chalfont and is proposed to be allocated for 700 homes, a primary school and 15 pitches for Gypsies and Travellers.

### 2.2 Scope

2.2.1 This report provides an appraisal of the site which consists of:

- A description of the landscape and visual baseline of the site and its surroundings;
- A review of the evidence base and the consideration of the landscape and visual aspects of the site that have taken place as part of the proposed allocation process; and
- A description of the key constraints to development and a summary of the key landscape impacts if development were to occur.

2.2.2 This appraisal is supported by a set of A3 figures which are provided in **Appendix 1**. Figures 7-18 are photographs. These have been included to support the description of landscape character. They are not intended to serve as representative viewpoints.

### 2.3 Guidance

2.3.1 This report follows the principles for landscape assessment set out in the Landscape Institute/Institute of Environmental Management and Assessment's *Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013) (GLVIA3)*.

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## 3 Landscape Context

### 3.1 Little Chalfont

- 3.1.1 Little Chalfont lies within the Chiltern District between the settlements of Amersham, 160 metres to the west and Chorleywood 1.1km to the south east. All three settlements developed after the arrival of the Metropolitan Railway in the late 19<sup>th</sup> Century and grew during the 20<sup>th</sup> Century as a result of the railway connection to London. The outward development of the settlements was eventually limited by the introduction of the Metropolitan Green Belt which encloses Little Chalfont on all sides (**Figure 3**). As a result, the village has retained its early 20<sup>th</sup> Century extent.
- 3.1.2 The village lies on the undulating chalk dip slope of the Chiltern Hills. The dip slope has a complex topography which includes long narrow valleys and shorter ‘tributary’ valleys; many of which are dry. Little Chalfont has remained on the gentler contours of higher ground between two long narrow valleys (River Chess Valley north of the village and River Misbourne Valley south of the village) and a third dry chalk valley east of the village (eastern dry valley) (**Figure 2**). The Metropolitan Railway is located within the continuation/ lower part of the eastern dry valley.
- 3.1.3 The northern part of the village is sandwiched between the steeper contours of the Chess Valley and the railway line which runs parallel to it. Consequently, this part of Little Chalfont grew alongside the railway and has a broadly linear form. The southern part of the village grew perpendicular to the railway between the more intricate edges of the Misbourne Valley and the eastern dry valley. The southern part of the village has a more convoluted form due to this topography.
- 3.1.4 The character of development also varies between the northern and southern parts of the village. The character of the northern part is typical of a post war suburb. It features regularly spaced properties set around a well-ordered road network. In contrast the southern part features very low-density development with large houses set on substantial plots of land. Properties have large gardens which feature mature trees, giving this part of the village a distinctly treed character (see **Photograph J** (Burtons Lane)). A number of roads in the southern part of the village are private and have a distinct character of their own (e.g. Loudhams Wood Lane and Long Walk).

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- 3.1.5 Much of the southern part of the village, including the western part of Long Walk and parts of Burtons Lane, are recognised as ‘Established Residential Areas of Special Character’ in the Adopted Chiltern District Local Plan (**Figure 3**). The corresponding policy (H4)<sup>6</sup> is saved.<sup>7</sup> H4 recognises that *‘housing areas with good-size gardens with mature trees and shrubs and street scenes with trees and hedges are highly valued, and many local people wish to have this type of environment conserved’* and that *‘the Council is firmly of the view that the scale and location of new housing development must be more strongly controlled than in the past if the attractive semi-rural character of many of its established residential areas is to be retained’*.<sup>8</sup>
- 3.1.6 In landscape terms, locally designated Areas of Special Character are helpful because they provide evidence as to which areas are valued and why. If the policy is removed through this Local Plan process it will not be because the area no longer has a special character. A Townscape Character Study, 2017 (see section 4 below) prepared for the Local Plan evidence base actually identifies a slightly larger area of special character at Little Chalfont than is currently covered by policy H4.
- 3.1.7 The leafy semi-rural character of the village’s southern parts complements its wider rural setting. This setting includes an attractive mixture of pastoral fields and woodlands. A large woodland (Pollards Wood) lies to the south of the village, and smaller loosely connected woodlands lie east of the village. These include Old Hanging Wood and New Hanging Wood which are named after their location on the side of the eastern dry valley (**Figure 4**). The mature trees in the southern part of the village help connect Pollards Wood with the woodlands around New Hanging Wood. This connected tree/woodland network is evident on aerial photography and on the ground. (**Figure 4 and 5**)
- 3.1.8 Public footpaths around Little Chalfont include Footpath (Fp) LCF/11/1 which runs from Lodge Lane through New Hanging Wood and Old Hanging Wood to the historic Manor of Chenies. Fp LCF/9/1 runs between New Road and Long Walk, where it terminates. North of Chenies lies Frogmore Meadow Nature Reserve which is a Site of Special Scientific Interest (SSSI). (**Figure 3**)

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<sup>6</sup> H4 states that development will not be permitted which affects the density of buildings or damages the special character of the area.

<sup>7</sup> CDC propose to remove the Established Residential Areas of Special Character designation in the new Local Plan

<sup>8</sup> Adopted Chiltern District Local Plan Policy H4

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## 3.2 The Chilterns AONB

- 3.2.1 The Chilterns Area of Outstanding Natural Beauty (AONB) designation wraps around the northern, eastern and southern parts of Little Chalfont (**Figure 3**). It excludes Little Chalfont, Amersham and the countryside between the two settlements and ends at Chorleywood.
- 3.2.2 The Chilterns are comprised of a chalk escarpment which ‘*faces to the north west*’ and a dipslope which ‘*appears more like a plateau, gently shelving to the south east, incised by shallow valleys, some with chalk streams flowing to the River Colne and River Thames*’.<sup>9</sup> The topography of the dipslope includes ‘*folds in the landscape*’ which ‘*hide many small dry valleys or coombs with no springs or streams. These places provide hidden ‘secret’ landscapes and unspoilt countryside*’.<sup>10</sup> The sense of these dry valleys being ‘secret’ landscapes is often enhanced by the high density of woodland cover across the Chilterns. The AONB is described as one of the most wooded landscapes in England and also features a high proportion of Ancient Woodland.<sup>11</sup>
- 3.2.3 The Chilterns AONB Management Plan 2014-2019 A Framework for Action (AONB Management Plan) (Section 5 and **Appendix 2**) prepared by the Chilterns Conservation Board (CCB) identifies the key issues facing the AONB and the management policies and actions needed to conserve its special qualities. It explains that the Chilterns AONB was designated for ‘*the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures*’.<sup>12</sup>
- ## 3.3 BP6 and Surroundings
- 3.3.1 BP6 occupies the upper part of the eastern dry valley (**Figure 2**). It is located immediately adjacent to the Chilterns AONB and forms part of its immediate setting (**Figure 3**). The

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<sup>9</sup> Chilterns AONB Management Plan 2014-2019 A Framework for Action

<sup>10</sup> Chilterns AONB Management Plan 2014-2019 A Framework for Action Page 19 Para 8

<sup>11</sup> Chilterns AONB Management Plan 2014-2019 A Framework for Action Page 7 Para 4 and Page 19 Para 5

<sup>12</sup> Chilterns AONB Management Plan 2014-2019 A Framework for Action Page 7 Para 2

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AONB designation ends at Lodge Lane<sup>13</sup> but in reality, the character of the AONB continues on both sides of the road. This is reflected in the fact that BP6 is within the same landscape character area as the AONB (see section 4 below).

- 3.3.2 BP6 occupies a dry chalk valley and features an attractive combination of woodland and pasture which is rural in character (see **Photographs E, G, H and I**). This includes the beech woodland of New Hanging Wood, which is a continuation of that within the AONB, Loudham's Wood and Stonydean Wood (**Figure 4**). The latter is identified as Ancient Woodland along with New Hanging Wood. Parts of Loudham's Wood and other wood pockets are identified as Priority Habitats (deciduous woodland) (**Figure 3**). Woodland within the site enhances the valley's enclosure and has resulted in a landscape which is representative of the '*hidden 'secret' landscapes and unspoilt countryside*' described in the AONB Management Plan. Woodland within BP6 also provides a treed backdrop to the village, including from Oakington Ave and Burtons Lane. The latter is part of an Area of Special Character (see section 4 below).
- 3.3.3 Lodge Lane is representative of the ancient rural lanes described in the Chilterns AONB.<sup>14</sup> Its narrow width and sunken sides - which are clad in Ancient Woodland - give it a deeply rural character (see **Photographs A, B and D**). Due to its undulating character, and the adjacent beech woodland and pasture, it is in fact a feature characteristic of the Chilterns. Historically it formed part of the route between the Latimer House Estate (a Registered Park and Garden on the northern side of Chess Valley) and the main road to Chalfont St Giles. Today it joins the same road (B4442) to Chalfont St Giles but the route north has been interrupted by the busy A404. The Lane south of the A404 (and Church Grove) runs across the dry valley and forms the western boundary of the site.
- 3.3.4 The northern boundary of BP6 is formed by the railway which is a strong settlement boundary. The railway lies on embankment east of Lodge Lane and is in cutting west of the Lane. South of the railway lies the former Golf Club (and club house) which ceased operating some years ago (see **Photograph K**). Beyond the golf course is Honours Yard, a small business estate (see **Photograph C**). The estate is encircled by woodland which minimises its presence within the landscape (**Figure 4**). However, activities at Honours

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<sup>13</sup> It includes parts of Lodge Lane - <https://landscapesforlife.org.uk/about-aonbs/aonbs/overview>

<sup>14</sup> As described in Chilterns AONB Management Plan 2014-2019 A Framework for Action Page 19 Para 11

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Yard include scaffold cleaning which is at times noisy and detracts from the otherwise peaceful nature of Lodge Lane/ New Hanging Wood.

- 3.3.5 The western boundary of BP6 is formed by a combination of residential property boundaries along Village Way, Loudhams Wood Lane and Burtons Lane. Both Village Way and Loudhams Wood Lane are private roads (**Figure 4**). A right of access over Loudhams Wood Lane is provided to Thames Water who have a pumping station within Stoneydean Wood. The southern boundary of BP6 is formed by a combination of Long Walk, also a private road, and the rear boundaries of eight properties along its northern side. The central and eastern parts of Long Walk feature properties only along the southern side. These lie outside of the defined Built Up Area<sup>15</sup> and are washed over by the Green Belt. A lack of footways, kerbs and other highway infrastructure (including street lighting) gives Long Walk a distinctive and informal character. It is also framed by mature trees and vegetation which assists in integrating the properties into their rural context. (see **Photographs Ei & F**)
- 3.3.6 Although the site is enclosed by development on three sides, the presence of this development is limited due to the sympathetic character of the surrounding residential areas, the woodland cover and localised variations in landform.
- 3.3.7 There are five residential properties within BP6. Two are located north of Honours Yard (Darley Lodge and Cambrai Lodge) and a third is located south of Honours Yard (Baytree Cottage). The other two are accessed from Burtons Lane. These are known as Pucks Paigles and Homestead Farm (**Figure 4**). The latter in 2017 had a planning appeal dismissed for an application to demolish a barn and erect three detached dwellings (**Appendix 3**).<sup>16</sup> The Inspector dismissed the appeal due to harm to the Green Belt and the character and appearance of the area. Regarding the latter point, the Inspector found that new houses would be *'entirely at odds with the more rural characteristics of the appeal site and the adjacent fields'*<sup>17</sup> and that *'in views from Burtons Lane and from nearby residential gardens and they would be seen as an obvious, residential intrusion into the*

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<sup>15</sup> Chiltern District Core Strategy and Policies Map adopted on 15th November 2011

<sup>16</sup> Appeal Decision 3160901 Homestead, Burtons Lane, Little Chalfont HP8 4BL

<sup>17</sup> Appeal Decision 3160901 Para 9

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*otherwise mainly rural surroundings*'.<sup>18</sup> Two barn conversions for residential use and the conversion of another outbuilding have been approved at Homestead Farm.

### 3.4 Summary & Conclusion on Landscape Value

3.4.1 The site is located immediately adjacent to the Chilterns AONB whose special qualities are set out in the AONB Management Plan. The attributes of the site, including the chalk valley landform and ancient woodland create a deeply rural landscape setting to the village, as well as providing priority habitat. These attributes are consistent with valued characteristics of the AONB and as such the site is considered to be a valued landscape in respect of the National Planning Policy Framework (NPPF) paragraph 170a.

3.4.2 Although the site is surrounded by development on plan, in reality this development has a limited presence due to its low density and treed/wooded character. Lodge Lane on plan appears to form a boundary separating the site from the wider AONB landscape. However, due to its undulating character, and the adjacent beech woodland and pasture, it is in fact a feature characteristic of the Chilterns.<sup>19</sup>

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<sup>18</sup> Appeal Decision 3160901 Para 10

<sup>19</sup> The eastern parts of Lodge Lane also appear to be within the AONB designation.

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## 4 Published Character Assessments

4.1.1 This section provides a review of published landscape and townscape character assessments. Both of which are evidence base documents for the Draft Local Plan.

### 4.2 Chiltern District Landscape Character Assessment, October 2011 (Appendix 4)

4.2.1 The Chiltern District Landscape Character Assessment, October 2011 (Landscape Assessment 2011) was prepared by Land Use Consultants on behalf of Chiltern District Council and BCC. The Landscape Assessment 2011 divides Chiltern District into ten different landscape character types (LCT) and smaller unique landscape character areas (LCA). BP6 falls within LCT 18 Rolling Farmland and specifically LCA 18.3 Little Chalfont. LCA 18.3 covers Little Chalfont and land to its east including the AONB up to the boundary with Three Rivers District, and south to Chalfont St Giles.

4.2.2 BP6 and its immediate context are highly representative of the description of LCA 18.3. Almost all of the key characteristics are displayed within the site, including:

- *'A rolling landscape with a varied geology. Predominantly chalk capped with Clay with Flints with Upper Chalk and River Terrace deposits across the eastern edge.*
- *Large arable fields and some rough grassland dominate in the north, delineated by a network of hedgerows with some post and wire fencing. Some smaller fields of paddock, pasture and rough grazing are typical of the south.*
- *Woodland interspersed throughout with large blocks at Pollards Wood, Newland Gorse and Shortenill's Wood, comprising broadleaved, mixed and coniferous areas. Some of which is ancient woodland, which gives rise to a dense and mature woodland character.*
- *The suburban edge of Little Chalfont filters into the area, integrated by tree cover. A low density of dispersed settlement occurs elsewhere, comprising individual farmsteads and properties.*
- *Stretches of roads through farmland and woodland which retain a rural character. The busy A404 (Amersham Road) and railway line cut through the north.*

- *A small number of footpaths, offering recreational access to woodland in the south (Newland Gorse and Shortenhill's Wood) and crossing open farmland the north.*
- *Varying levels of enclosure, with views often confined by woodland. Some long views across open sweeping farmland, often to a wooded backdrop.*
- *Away from the busy A404 and settlement edges, a rural and peaceful landscape is retained.*<sup>20</sup> (emphasis added)

4.2.3 The Landscape Assessment 2011 includes an evaluation of LCA 18.3 which states that the strength of character and intactness of the LCA as a whole is 'moderate'. The assessment provides a strategy/vision which is: *'To conserve and enhance the woodland, farmland and historic parkland which is retained between settlements and which contributes to the rural, peaceful character of Little Chalfont Rolling Farmland'*.<sup>21</sup> (emphasis added)

4.2.4 The Landscape Assessment 2011 identifies a number of potential landscape and visual sensitivities within LCA 18.3, which include:

- *'The open farmland and woodland cover (large areas of ancient woodland) which provides enclosure, a backdrop to views and biodiversity value.*
- *The rural farmed and wooded character of the landscape occurring between the settlement of Little Chalfont and Chorley Wood/ Rickmansworth.*
- *Stretches lanes/roads through open farmland or enclosed by woodland which retain a rural character'*.<sup>22</sup>

4.2.5 Relevant Landscape Guidelines for LCA 18.3, include:

- *'Conserve and manage the mosaic of woodland and farmland which is key to retaining a rural character between settlements.*
- *Promote appropriate management of farmland, to help generate a wildlife rich habitat, and visually attractive landscape.*
- *Encourage management and restoration of hedgerows, filling in gaps where necessary and seek opportunities to recreate and extend these habitats.*

<sup>20</sup> Chiltern District Landscape Character Assessment, October 2011 Page 91

<sup>21</sup> Chiltern District Landscape Character Assessment, October 2011 Page 95

<sup>22</sup> Chiltern District Landscape Character Assessment, October 2011 Page 95

- *Conserve the areas of woodland and manage to enhance biodiversity value and as a recreational resource.*
- *Conserve the character of rural roads.*
- *Seek to avoid further expansion of settlement which leads to suburbanisation along roads'.<sup>23</sup>*

#### 4.3 Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study, November 2017 (Appendix 5)

4.3.1 The Chiltern and South Bucks Townscape Character Study, November 2017 (Townscape Study) was prepared by Chris Blandford Associates on behalf of Chiltern and South Bucks District Councils (CSBDC). Its purpose was to (inter alia):

- Undertake a consistent townscape character assessment of settlements excluded from the Green Belt.
- Identify any areas in the settlements that have a special townscape character and are particularly vulnerable to change, and therefore merit protection from intensification and other forms of insensitive development.<sup>24</sup>

4.3.2 The Townscape Study explains how the village includes areas which make a particular contribution to the distinctiveness of the village as a whole. This includes '*areas with a distinctive and secluded character, with soft mown verges, hedged front garden boundaries and deep front gardens containing mature trees and vegetation, which were deliberately designed to create a green street scene, such as along Loudham Wood Lane and Village Way*'.<sup>25</sup> The central and eastern parts of Long Walk were omitted from the study as they lie outside of the identified Settlement Boundary.<sup>26</sup>

4.3.3 Parts of the village which abut the western boundary of BP6 fall either within the 'Green Suburban Roads' (north of Loudham's Wood) or 'Woodland Roads' (south of Loudham's Wood) townscape character types (TCT) (Appendix 5). Chapter 4 of the Townscape Study

<sup>23</sup> Chiltern District Landscape Character Assessment, October 2011 Page 95

<sup>24</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Para 1.1.9

<sup>25</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Para 2.2.6

<sup>26</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Figure 2.2a

describes each TCT and provides planning and design principles to guide development within them.

4.3.4 The Woodland Roads TCT is characterised by its ‘landscape quality and high sensitivity’ and is typically ‘located close to the edge of settlements’.<sup>27</sup> This TCT is described as often having a ‘*backdrop or views to the surrounding rural or woodland landscape*’ which is ‘*especially important to the character of areas that face or back on to AONB, Ancient Woodland or SSSI designated land*’.<sup>28</sup> Threats to the character of this TCT include:

- ‘*New dwellings [which] do not relate well to the existing topography, using retaining walls rather than working with existing levels.*
- ‘*Buildings [which] are too close together or too near boundaries, giving less space for landscape*’.

4.3.5 The planning and design principles include ‘*where areas are located around edges of settlements, preserve them as a soft green edge*’ and ‘*retain woodland character by retaining trees and hedgerows around buildings and in backdrop and views to and from homes*’.<sup>29</sup>

4.3.6 The Green Suburban Roads TCT is characterised by ‘*plots arranged in a regular manner with a strong landscape character*’. Threats to the character of this TCT include ‘*Buildings that are spaced close together, not allowing sufficient space for tree planting and so reducing the landscape character*’. The planning and design principles include:

- ‘*Maintain existing mature trees and hedgerows within plots, streets and surrounding backdrop - especially in areas around the edges of settlements or near AONB, SSSI and Ancient Woodland designations*
- ‘*Maintain rhythm and spacing of housing and avoid developing houses which are placed too close together*’.<sup>30</sup>

4.3.7 The southern part of the village adjacent to BP6 is identified within an Area of Special Character known as the ‘Burtens Lane to Doggetts Wood Lane Area of Special Character’. **Figure 5** This covers a slightly larger area than that covered by Adopted Local Plan Policy

<sup>27</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Para 4.4.1

<sup>28</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Para 4.4.2

<sup>29</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Page 157

<sup>30</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Page 159

H4 (section 3 above and Figure 3). The Townscape Study explains that this area has been identified due to its *'high quality townscape'* which is *'considered particularly vulnerable to change as a result of its distinctive low density pattern of detached and semi-detached houses with a variety of architectural styles set within large garden plots associated with mature vegetation, fronting onto the green streetscape'*.<sup>31</sup> Trees are said to *'make a substantial contribution to the character and sense of enclosure'* in this area.<sup>32</sup>

4.3.8 The Townscape Study also identifies 'sensitive settlement edges'. These appear to have been identified where the village abuts the AONB. As such the section of Lodge Lane north of the railway bridge is identified as a sensitive edge (**Figure 5**), whereas the Lane south of the railway bridge which adjoins the site is not.<sup>33</sup> The edge north of the railway is described as being *'particularly sensitive to new development due to landscape quality of AONB & Ancient Woodland'*.<sup>34</sup>

#### 4.4 Summary

4.4.1 BP6 falls within LCT 18 Rolling Farmland and specifically LCA 18.3 Little Chalfont in the Chilterns Landscape Character Assessment, 2011. LCA 18.3 covers Little Chalfont and land to its east including the AONB east of Lodge Lane. BP6 and its immediate context are highly representative of the description of LCA 18.3 as almost all of the key characteristics are displayed within the site. Relevant Landscape Guidelines for LCA 18.3, include:

- *'Conserve and manage the mosaic of woodland and farmland which is key to retaining a rural character between settlements.'*
- *Conserve the character of rural roads.*
- *Seek to avoid further expansion of settlement which leads to suburbanisation along roads'*.<sup>35</sup>

4.4.2 Parts of the village which adjoin the western boundary of BP6 fall either within the 'Green Suburban Roads' (north of Loudham's Wood) or 'Woodland Roads' (south of Loudham's Wood) TCT within the Chiltern and South Bucks Townscape Character Study, 2017. These

<sup>31</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Para 2.2.21

<sup>32</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Para 2.2.17

<sup>33</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Figure 2.2a

<sup>34</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Figure 2.2a

<sup>35</sup> Chiltern District Landscape Character Assessment, October 2011 Page 95

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parts of the village are within the Burtons Lane to Doggetts Wood Lane Area of Special Character which is identified as being particularly vulnerable to change. This is due to its distinctive low-density pattern and mature vegetation. Planning and Design Principles for the TCTs include:

- *‘Where areas are located around edges of settlements, preserve them as a soft green edge’* (Woodland Roads TCT)
- *‘Retain woodland character by retaining trees and hedgerows around buildings and in backdrop and views to and from homes’* (Woodland Roads TCT)
- *‘Maintain existing mature trees and hedgerows within plots, streets and surrounding backdrop - especially in areas around the edges of settlements or near AONB, SSSI and Ancient Woodland designations’* (Green Suburban Roads TCT)
- *‘Maintain rhythm and spacing of housing and avoid developing houses which are placed too close together’*.<sup>36</sup> (Green Suburban Roads TCT)

4.4.3 BP6 is therefore sandwiched between the AONB to its east and an Area of Special Character to its west.

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<sup>36</sup> Chiltern & South Bucks District Councils Chiltern and South Bucks Townscape Character Study Page 159

## 5 Review of Draft Local Plan Evidence Base

5.1.1 This section provides a review of the evidence base for the Draft Local Plan with regards to landscape and visual matters relevant to BP6.

### 5.2 The Chilterns AONB Management Plan 2014-2019 A Framework for Action

5.2.1 The AONB Management Plan (Appendix 2) sets out the vision for the AONB which includes:

- *The setting of the Chilterns is valued and protected by ensuring development adjacent to the AONB also respects its national importance.*<sup>37</sup> (Within the section ‘Conserve and enhance the natural beauty’)
- *‘New buildings, utilities and transport infrastructure are designed and built to high environmental standards that respect the character of the built environment and the character, setting and tranquillity of the landscape.’*<sup>38</sup> (Within the section ‘Natural beauty’)
- *Tranquillity is conserved and where noise is a problem, peace and quiet is restored, in particular by reducing noise generated by road traffic, overflying aircraft and trains.*<sup>39</sup> (Within the section ‘Understanding and enjoyment’)

5.2.2 One of the influences on the natural beauty of the Chilterns AONB is identified as: *‘The pressures for development and the long urban fringe along the AONB boundary means there will be continuing pressure which may lead to urbanisation, illegal activities such as fly tipping and problems for landowners especially those who wish to continue commercial farming. This pressure may also lead to loss of tranquillity due to increases in noise from roads, railways, aircraft and the general background noise created in built up areas.’* (emphasis added)

5.2.3 The impact of development within the setting of the AONB is also identified as a key issue:

*‘The potential impact of development in the area surrounding the AONB needs to be given greater weight as inappropriate and poorly designed development can*

<sup>37</sup> Chilterns Area of Outstanding Natural Beauty Management Plan 2014-2019 Page 4

<sup>38</sup> Chilterns Area of Outstanding Natural Beauty Management Plan 2014-2019 Page 5

<sup>39</sup> Chilterns Area of Outstanding Natural Beauty Management Plan 2014-2019 Page 5

*significantly affect the AONB and its enjoyment. This plan places considerable emphasis on the need to value the setting of the AONB as an integral part of the efforts to conserve the landscape of the AONB itself and should be reflected in neighbouring Local Plans’.*<sup>40</sup> (emphasis added)

5.2.4 The Board’s Position Statement: Development Affecting the Setting of the Chilterns AONB (AONB Position Statement) (Appendix 6) provides the following advice:

*‘The setting of the Chilterns AONB does not have a geographical border. The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the AONB. A very large development may have an impact even if some considerable distance from the AONB boundary. However, the distance away from the AONB will be a material factor in forming a decision on any proposals, in that the further away a development is from the AONB boundary the more the impact is likely to be reduced’.*<sup>41</sup>

5.2.5 Examples of adverse impacts of developments within the setting of the AONB on the natural beauty and special qualities of the AONB itself are given in the AONB Position Statement and include (inter alia):

- *‘Blocking or interference of views out of the AONB particularly from public viewpoints or rights of way;*
- *Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB;*
- *Introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB;*
- *Change of use of land that is of sufficient scale to cause harm to landscape character; and*
- *Reduction in public access and detrimental impacts on the character and appearance of rural roads and lanes’.*<sup>42</sup> (emphasis added)

<sup>40</sup> Chilterns AONB Management Plan 2014-2019 A Framework for Action Page 22 Para 24

<sup>41</sup> Development affecting the setting of the Chilterns AONB - Adopted June 2011 (Rev 1) Para 14

<sup>42</sup> Development affecting the setting of the Chilterns AONB - Adopted June 2011 (Rev 1) Para 15

5.2.6 The AONB Position Statement advises that *‘the best way of minimizing adverse impacts on the setting of the AONB is through avoidance in the first place, so that schemes bring about the conservation or enhancement of the setting of the AONB’*. In relation to development within the setting of the AONB, the CCB supports:

- *‘Measures to consider the impact on the setting of the AONB, including where required through Landscape and Visual Impact Assessments...;*
- *Care being taken over the design, orientation, site layout, height, bulk and scale of structures and buildings through the preparation of a design and access statement; and*
- *Consideration not just of the site but also the landscape and land uses around and beyond it.*<sup>43</sup>

### 5.3 Landscape Capacity Assessment for Green Belt Development Options in the emerging Chiltern and South Bucks Local Plan, November 2017 (Appendix 7)

5.3.1 The Landscape Capacity Assessment for Green Belt Development Options in the emerging Chiltern and South Bucks Local Plan, November 2017 (Capacity Assessment) was prepared by TerraFirma on behalf of CSBDC. This assessment looked at the capacity to deliver development within 15 green belt option sites based on a development scenario of *‘nominal densities ranging from 30-40 residential dwellings per hectare including the provision of open space serving the development, with dwellings of two or three storeys’*.<sup>44</sup>

5.3.2 BP6 was one of the green belt option sites assessed. The methodology for determining landscape capacity was based upon the following assessment stages:

- visual sensitivity (stage 1)
- landscape sensitivity (stage 2)
- landscape character sensitivity (combination of stages 1 and 2) (stage 3)
- wider landscape sensitivity (stage 4)
- overall landscape sensitivity (combination of stages 3 and 4) (stage 5)
- landscape value (stage 6)

<sup>43</sup> Development affecting the setting of the Chilterns AONB - Adopted June 2011 (Rev 1) Para 18

<sup>44</sup> Landscape Capacity Assessment for Green Belt Development Options 2017 Para 7.4

- landscape capacity (combination of stages 5 and 6) (stage 7)

5.3.3 The assessment used a five-point scale from low to high and matrices were used where scores were combined. The overall scores were based on a verbal scale of low, low/medium, medium, medium/high and high capacity.

5.3.4 A number of concerns are noted regarding the methodology used in the Capacity Assessment:

- The methodology is overly complex making it difficult to follow.
- The criteria used to assess landscape value appear to be based on quality and rarity only. These criteria for value are too narrow and fail to account for other aspects of landscape such as recreation and conservation interest which can add value.<sup>45</sup>
- The value assessment is weighted heavily towards designations and does not allow for recognition of high landscape value for valued landscapes outside of designated areas (such as the eastern dry valley in which BP6 is located).
- International designations e.g. World Heritage Sites and Special Areas of Conservation are cited as examples of 'high' value. This threshold is too high. This approach has distorted the assessment of value such that National Parks and AONBs are considered to only have medium/high value.<sup>46</sup>

5.3.5 The Capacity Assessment identifies the site's similarities with the AONB. It describes BP6 as having a *'varied topography with gently rolling / folding dry valleys - one running south-west to north-east across the centre of the site, one running south to north in the centre of the southern part of site - [which is] a special quality of the adjacent AONB'*. (landscape character sensitivity)<sup>47</sup> In the section on wider landscape sensitivity the assessment states that the BP6's *'Landform and woodland / farmland mosaic is largely typical of wider character with links to landscape and AONB to east'*.

5.3.6 Despite having recognised that the site is representative of the immediately adjacent AONB, the Capacity Assessments concludes its value and sensitivity are medium and

<sup>45</sup> As recommended in Box 5.1 of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3).

<sup>46</sup> In a recent decision in the Chilterns AONB an Inspector disagreed with assessments of land within the AONB as having only medium value and stated *'40. Whatever 'value' is attached to the appeal site itself, it still forms part of the overall high value protected landscape of the AONB.'* App 3209551 Stonesfield, Oxfordshire (Appendix 8)

<sup>47</sup> Landscape Capacity Assessment for Green Belt Development Options 2017 Site 6 (No page numbers)

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medium/low respectively. These judgements are considered to underestimate the value of the site, for the reasons set out in section 3 of this report.

5.3.7 The overall capacity score for BP6 was medium which is defined as *‘The landscape could be able to accommodate areas of new development in some parts, providing it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas. There are landscape and visual constraints and therefore the key landscape and visual characteristics must be retained and enhanced’*.<sup>48</sup>

5.3.8 In the conclusions and recommendations for BP6 the Capacity Assessment states that *‘Development on site 6 is constrained by the need to protect existing trees and woodlands, to protect views from the edge of the AONB and the rural character of Lodge Lane, and to keep built form out of the dry valley landscape, in line with identified special qualities of the AONB’*. The assessment goes on to recommend areas that could be developed (‘proposed development areas’) and identifies these on Figure 6.2 (**Appendix 7 of this report**). These areas comprise:

- The former golf course;
- Land immediately south of properties on Loudhams Wood Lane;
- Land immediately north of the eastern part of Long Walk; and
- Land within the Honours Yard business estate.

5.3.9 The assessment suggests that at a density of between 30-35 dwellings per hectare (dph) the proposed development areas could accommodate 547-638 dwellings. This is significantly less than the 700 sought by Draft Policy BP6.

5.3.10 Figure 6.2 of the Assessment also shows five ‘preferred access’ routes into the site. These include three from Lodge Lane, one along the existing driveway to Homestead Farm and another off Loudhams Wood Lane, a private road. The feasibility of these routes and the potential impacts of the development suggested by the Capacity Assessment overall is addressed in section 7 of this report.

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<sup>48</sup> Landscape Capacity Assessment for Green Belt Development Options 2017 Para 7.21

#### 5.4 Buckinghamshire & Milton Keynes Historic Landscape Characterisation, 2006

5.4.1 The Buckinghamshire & Milton Keynes Historic Landscape Characterisation, 2006 (Historic Landscape Study) was prepared by BCC in order to ‘better appreciate and value’ the historic landscape resource. The study divides the county into different historic landscape character (HLC) types which are available to view online.<sup>49</sup>

5.4.2 A sensitivity rating for each HLC type is provided based upon its ‘*rarity, trajectories of change over the last 100 years (i.e. how much has been gained or lost), capacity to absorb change, biodiversity and archaeological potential and potential to contribute to quality of life*’.<sup>50</sup> The rating is provided on a scale from low, medium/low, medium, medium/high and high.

5.4.3 Within BP6 are two areas of the Ancient Woodland HLC type which has a high sensitivity. (**Figure 5**) This HLC type includes Stonydean Wood and New Hanging Wood. Loudham’s Wood is characterised as Woodland (Secondary 18th - 19th Century) which has a medium sensitivity.

#### 5.5 Buckinghamshire Green Infrastructure Delivery Plan, August 2013 (Appendix 9)

5.5.1 The Buckinghamshire Green Infrastructure Delivery Plan, August 2013 was prepared for the Buckinghamshire and Milton Keynes Natural Environment Partnership by Land Use Consultants. It identifies area specific Green Infrastructure (GI) proposals and projects within the strategic GI framework established in the Buckinghamshire GI Strategy, 2009.

5.5.2 The area surrounding and including Little Chalfont (‘Amersham-Chesham-Little Chalfont’) is discussed within the GI Delivery Plan. This area is described as forming part of an identified key GI corridor despite not being within an identified Priority Area in the Buckinghamshire GI Strategy. Little Chalfont is described as having a ‘*highly distinctive Metroland heritage and low density garden suburb type layout in place*’<sup>51</sup> and is referenced specifically for its level of tree cover.<sup>52</sup> The overall GI objective for this area is ‘*Providing enhanced physical access, landscape and habitat connectivity to the principal*

<sup>49</sup> <http://buckscc.maps.arcgis.com/apps/webappviewer/index.html?id=4b37c160dbe54f8e85f9e1b3dec50af9>

<sup>50</sup> Buckinghamshire & Milton Keynes Historic Landscape Characterisation, 2006 Page 15

<sup>51</sup> Buckinghamshire Green Infrastructure Delivery Plan Page 29

<sup>52</sup> Buckinghamshire Green Infrastructure Delivery Plan Page 31

*chalk valleys, and to enhance the landscape setting of the settlements/protect valley landscapes’*.<sup>53</sup> (emphasis added)

5.5.3 At a strategic level, the GI Delivery Plan highlights that the landscape around and including Little Chalfont is ‘*part of the adjacent Hertfordshire and London Wildlife Trust’s Colne and Crane Valley Living Landscape Area - [which] aims for enhanced landscape and habitat connectivity’*.<sup>54</sup> (emphasis added)

## 5.6 Sustainability Appraisal of Chiltern and South Bucks Local Plan, June 2019 (Appendix 10)

5.6.1 A sustainability appraisal (SA) of the Draft Local Plan was prepared by Lepus Consulting on behalf of CSBDC and published in June 2019. The purpose of the SA was to:

- *‘Identify, describe and evaluate the likely sustainability effects of the Emerging Local Plan proposals and their reasonable alternatives;*
- *Inform the Councils’ decision making and preparation of the Local Plan; and*
- *Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA’*.<sup>55</sup>

5.6.2 A sustainability appraisal of a Local Plan should comply with the Strategic Environmental Assessment (SEA) Directive<sup>56</sup>, which includes requirements to:<sup>57</sup>

- *Describe the environmental characteristics of areas likely to be significantly affected; and*
- *The likely significant effects on the environment, including on issues such as ... landscapes. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.*

5.6.3 The SA includes 12 SA Objectives which are intended to measure the Draft Local Plan’s sustainability performance. Objective 2 Landscape is the most relevant to this appraisal

<sup>53</sup> Buckinghamshire Green Infrastructure Delivery Plan Page 31

<sup>54</sup> Buckinghamshire Green Infrastructure Delivery Plan Page 27

<sup>55</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, N74 Page xxvii

<sup>56</sup> As implemented through the Environmental Assessment of Plans and Programmes Regulations 2004

<sup>57</sup> As summarised in Strategic Environmental Assessment Regulations requirements checklist published by the Ministry of Housing, Communities & Local Government

and its description is to *'Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities'*.<sup>58</sup>

5.6.4 The decision-making criteria for Objective 2 Landscape were:

- *'Will it safeguard and enhance the character of the landscape and local distinctiveness and identity?*
- *Will it protect and enhance visual amenity, including light and noise pollution?*
- *Will it reuse degraded landscape/townscape?*
- *Will it compromise the purpose of the Green Belt e.g. will it lead to coalescence of settlements and/or urban sprawl?*
- *Will it protect and enhance the characteristics and setting of the Chilterns AONB and/or Colne Valley Regional Park?'*<sup>59</sup>

5.6.5 The significance of the impact on SA Objective 2 as a result of development in accordance with Policy SP BP6 is recorded as **moderate negative**, which is the second highest/most harmful level, defined as *'the size, nature and location of a proposed scheme would be likely to:*

- *Be out of scale with the location; and/or*
- *Leave an adverse impact on a receptor of recognised quality'*.<sup>60</sup>

5.6.6 It is however surprising that a major negative impact for landscape has not been recorded against BP6 given that it lies immediately adjacent to the AONB. The SA assessment methodology explains that *'sites which lie adjacent to the boundary of the AONB are assumed to have a substantial effect on the setting to the AONB and a major negative impact on the landscape objective is expected'*.<sup>61</sup>

5.6.7 Oddly the moderate negative impact recorded for BP6 appears to have come about as a result of a perceived potential for coalescence with Chorleywood<sup>62</sup>.

<sup>58</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, Table 4.1 Page 15

<sup>59</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, Appendix A, Page A1

<sup>60</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, Table 4.4 Page 22

<sup>61</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, Table 4.5 Page 27

<sup>62</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, Appendix E, Page E53

5.6.8 At a plan level, the SA explains that residual adverse impacts are expected as a result of the Draft Local Plan. One of which concerns a ‘discord with the local landscape character’ which is described as follows:

*‘There is the potential for the development in the Local Plan to lead to a loss of sense of place through the introduction of built form which does not respect the locally distinctive character of existing settlements which contributes to the strong sense of place exhibited in many locations within the Plan area. The development of some of the sites proposed in the Plan may lead to the physical, or perceived, loss of separation between settlements’.*<sup>63</sup>

5.6.9 Another relevant residual impact is the ‘alteration of views’ which is described as follows:

*‘The development proposed in the Plan has the potential to adversely impact on views from more sensitive locations such views from the Chilterns AONB and views from National Trails. There is also the potential for adverse impacts on informal high-quality viewing experiences that can be gained from the local PRoW network around proposed development locations’.*<sup>64</sup>

5.6.10 Other relevant residual impacts specifically identified in the SA include the Increase risk of coalescence and/or urban sprawl and a loss of tranquility.

## 5.7 Summary

5.7.1 BP6 has been considered within a number of relevant evidence base studies which have consistently identified constraints and sensitivities to development.

5.7.2 The site’s location within the AONB setting is a major constraint. The Chilterns Conservation Board has published a Position Statement regarding development affecting the setting of the AONB. It identifies significant or abrupt changes to landscape character, particularly where they are originally of a similar character to the AONB, as being likely to result in adverse effects on the natural beauty and special qualities of the AONB.

5.7.3 The Capacity Assessment identifies that BP6 is representative of the immediately adjacent AONB and that other constraints include existing trees and woodlands, the rural character

<sup>63</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, Table N.4 Page xxviii

<sup>64</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, Table N.4 Page xxviii

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of Lodge Lane, and the dry valley landscape. In an attempt to address these constraints, the Capacity Assessment identifies five ‘preferred access’ routes into the site and four discrete ‘proposed development areas’. It considers these might accommodate between 547-638 dwellings at a density of 30-35 dph. This yield is significantly less than the 700 sought by Draft Policy BP6. This level of development is also in conflict with the Capacity Assessment where it states, ‘*the key landscape and visual characteristics must be retained and enhanced*’ as BP6’s valued characteristics will not be retained if they are surrounded by development let alone enhanced.

- 5.7.4 Additional sensitivities not identified within the Capacity Assessment include the identification of highly sensitive HLC types (Ancient Woodland) within the site and the GI Objective to Provide ‘*enhanced physical access, landscape and habitat connectivity to the principal chalk valleys, and to enhance the landscape setting of the settlements/protect valley landscapes*’. (Buckinghamshire Green Infrastructure Delivery Plan) <sup>65</sup>
- 5.7.5 The sustainability appraisal of the Draft Local Plan identifies that development in accordance with Policy SP BP6 would result in a moderate negative impact overall, which is the second highest/most harmful level. It is however surprising that a major negative impact for landscape has not been recorded against BP6 given that it lies immediately adjacent to the AONB. The SA assessment methodology explains that ‘*sites which lie adjacent to the boundary of the AONB are assumed to have a substantial effect on the setting to the AONB and a major negative impact on the landscape objective is expected*’.<sup>66</sup> It therefore appears that the SA’s own methodology has not been applied in the case of BP6.

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<sup>65</sup> Buckinghamshire Green Infrastructure Delivery Plan Page 31

<sup>66</sup> SA of the Chiltern and South Bucks Local Plan: Regulation 19, June 2019, Table 4.5 Page 27

## 6 Green Belt Assessments

### 6.1 Introduction

6.1.1 BP6 lies within the Green Belt. This section provides a review in chronological order of the relevant green belt assessments prepared for the Draft Local Plan evidence base. A summary of the process is provided in Table 1 below.

6.1.2 **Table 1: Summary of Green Belt Assessment Process**

Study	Approach	Is BP6 considered?	Conclusion
Buckinghamshire Green Belt Assessment, March 2016 (Green Belt Assessment Part One)	Considers whether large parcels of land contribute to the purposes of the GB.	Yes - referred to as General Area 35.	Contributes to the purposes of the green belt but in combination with General Area 29 is taken forward for further consideration as RSA-10.
Green Belt Development Options Appraisal, October 2016	To assess parcels identified in GB Assessment Part One against a range of factors, including potential landscape impacts.	Yes - both as part of RSA-10 which was given a new reference (1.08) and as 2.10 (which covered a similar area to BP6)	2.10 should be included as a Preferred Option for consultation.
Green Belt Assessment Part Two Draft Report, October 2016	To consider the recommended sub areas identified in GB Assessment Part One.	Yes - both as part of 1.08 and as 2.10.	2.10 contributes to the purposes of the green belt but exceptional circumstances may apply to justify its

			removal from the GB.
Green Belt Preferred Options Consultation, October 2016	To consult on the preferred options identified based on the findings of the Green Belt Part One and Draft Part Two Assessments, and the Options Appraisal.	Yes - referred to as Preferred Option 6.	Identifies Option 6 as preferred option but considers not all the land is developable due to existing constraints.
Green Belt Development Options Appraisal, November 2017	To assess each of the 15 preferred options against conclusions of other evidence base documents. Included section on landscape assessment.	Yes - referred to as Option 6.	Identifies a number of constraints to development but concludes Option 6 should be removed from the Green Belt.
Chiltern & South Bucks Stage 2 Green Belt Assessment Strategic Role of the Metropolitan Green Belt in Chiltern & South Bucks, March 2018	To inform Part Two of the Green Belt Assessment by considering the performance of the green belt at a macro scale.	Yes - mostly within one of four strategic zones referred to as Strategic Zone C - Chilterns Wedge.	Chilterns Wedge plays a 'strong' role in meeting Green Belt Purposes 1, 3 and 4, and a 'very strong' role in meeting Purpose 2.
Green Belt Assessment Part Two Update, April 2019	Consider the Part One findings in more detail to inform consideration of whether exceptional circumstances exist to justify Green Belt removal.	Yes - but only as part of 1.08 (the findings from the draft assessment concerning 2.10 do not appear to have been updated since	1.08 performs moderately against GB purposes but northern part of 1.08 performs less strongly than the southern area against Purposes 2 and 3.

		2016 Draft Report)	
Green Belt Exceptional Circumstances Report, May 2019	To make a case for exceptional circumstances to remove land from the green belt.	Yes - both as part of 1.08 and as 2.10.	Disbenefits of releasing 1.08 outweigh benefits. However exceptional circumstances exist for the release of Area 2.10 (BP6 site) from the green belt.

## 6.2 Buckinghamshire Green Belt Assessment, March 2016 (Green Belt Assessment Part One) (Appendix 11)

6.2.1 The Buckinghamshire Green Belt Assessment, March 2016, was prepared by Arup on behalf of the Buckinghamshire local authorities. This assessment formed part one of the green belt assessment, which has been undertaken in two phases. It assessed strategic land parcels ('General Areas') against the purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF):

- **Purpose 1** - To check the unrestricted sprawl of large built-up areas;
- **Purpose 2** - To prevent neighbouring towns merging into one another;
- **Purpose 3** - To assist in safeguarding the countryside from encroachment;
- **Purpose 4** - To preserve the setting and special character of historic towns; and
- **Purpose 5** - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.2.2 Purpose 5 was omitted from the assessment, as is common practice, as it is not a site-specific purpose. Assessment scoring was undertaken and recorded on a scale of 0 (does not meet purpose) to 5 (meets purpose strongly).

6.2.3 General Area (GA) 35 included the BP6 site but covered a slightly larger area (48.9 ha). The assessment proforma for GA35 is attached as **Appendix 11**. It scored Medium overall against GB purposes.<sup>67</sup> The purpose scoring for GA35 is below:

- P1 - 0/5
- P2 - 1/5
- P3 - 3/5
- P4 - 0/5

6.2.4 By the assessment's own methodology GA35 should have scored at least 4 against purpose 3. The scoring for P3 (safeguarding the countryside from encroachment) was based upon the % of built form within the GA. The scoring is set out below:

- *5: Contains less than 5% built form and possesses a strong unspoilt rural character.*
- *4: Contains less than 10% built form **and/or** possesses a strong unspoilt rural character.*
- *3: Contains between 10% and 20% built form and/or possesses a largely rural open character.*
- *2: Contains between 20% and 30% built form and/or possesses a semiurban character.*
- *1: Contains less than 30% built form and/or possesses an urban character.*
- *0: Contains more than 30% built form and possesses an urban character.<sup>68 69</sup>*  
(emphasis added)

6.2.5 The assessment states that GA35 is covered by less than 5% built form.<sup>70</sup> Therefore given that GA35 satisfied the first requirement (less than 10%) it should have been awarded a score of 4. This scoring should have discounted GA35 from the process:

<sup>67</sup> Map 5.5a Overall Assessment Scores, North

<sup>68</sup> Buckinghamshire Green Belt Assessment 2016, Page 62

<sup>69</sup> It is noted that in an earlier draft the

<sup>70</sup> Buckinghamshire Green Belt Assessment 2016, Assessment proforma for GA35

*'any General Area scoring strongly (4 or 5) against the criteria for one or more NPPF purpose was judged to be meeting the purposes strongly overall and therefore deemed unsuitable for further consideration in Part 2 of the Green Belt Assessment, except where a possible sub-division was identified'.<sup>71</sup>*

6.2.6 It is not clear why but in the recommendations section of the assessment GA35 is considered in combination with GA29, which covered a much larger tract of land south and east of GA35. In combination these two parcels were categorised within Recommendation Category 3, defined as *'Medium or strongly scoring General Areas where there is clear scope for sub-division to identify weakly performing 'sub-areas', including the presence of boundary features which have the potential to be permanent and recognisable; these areas could be afforded further consideration in accordance with the above provisions'.<sup>72</sup>*

6.2.7 The assessment then identified smaller areas of land ('Recommended Sub Areas' (RSA)) within the General Areas that were recommended for further testing in the Part Two Green Belt Assessment. A Sub Area (RSA-10) was identified within the combined GA29/35 area. It covered all of the BP6 site and land to the south between Lodge Lane and the B442 (Nightingales Lane) (approximately 163ha). The recommendation for RSA-10 stated that it *'may score weakly and could be considered further'.<sup>73</sup>*

### 6.3 Green Belt Development Options Appraisal, October 2016

6.3.1 The Green Belt Development Options Appraisal, October 2016 was prepared by CSBDC in order to assess parcels identified in GB Assessment Part One against a range of factors, including potential landscape impacts. RSA-10 was considered but was given a new reference number (1.08).

6.3.2 The overall recommendation for 1.08 was that the land comprising BP6 should be included for removal from the GB but that the rest of 1.08 should remain in the GB. The northern part of 1.08 (BP6) was then assessed separately and given a new reference (2.10). Parcel 2.10 covered a slightly larger area than GA35 above (and also BP6) as it included land north of the railway (51.22ha). The overall conclusion for 2.10 was that it should be included as a Preferred Option for consultation.

<sup>71</sup> Buckinghamshire Green Belt Assessment 2016, Page 49 Para 4.4.4

<sup>72</sup> Buckinghamshire Green Belt Assessment 2016, Page 98

<sup>73</sup> Buckinghamshire Green Belt Assessment 2016, Page 125

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- 6.4 Green Belt Assessment Part Two Draft Report October 2016 (superseded in part) (Appendix 12)
- 6.4.1 The Green Belt Assessment Part Two Draft Report October 2016 was prepared by CSBDC in order to ‘*consider through more detailed assessment the appropriateness of any adjustments to the Green Belt boundary in respect of those areas identified in Part One*’.
- 6.4.2 The draft assessment considered whether or not exceptional circumstances might apply to justify an alteration to the Green Belt boundary. In the case of 1.08 it was found that exceptional circumstances would not apply. However, in the case of 2.10 exceptional circumstances were considered to exist.
- 6.4.3 Within the description of parcel 2.10 the draft assessment considered that the BP6 site had already suffered encroachment as a result of the golf course and Honours Yard. In the conclusion regarding whether exceptional circumstances might apply, it stated ‘*the existing developed roads and the presence of a depot in the middle of the area already give an urban fringe character to the area*’.<sup>74</sup> This statement exaggerates the influence of the existing buildings within BP6 and those of the neighbouring village. It misrepresents the character of the site - which is deeply rural in many parts.<sup>75</sup>
- 6.4.4 The purpose scoring for 2.10 was the same as for GA35 in the Part One GB Assessment:<sup>76</sup>
- P1 - 0/5
  - P2 - 1/5
  - P3 - 3/5
  - P4 - 0/5
- 6.4.5 The scoring for P3 should again have been 4 as the draft assessment used the same criteria and scoring for the green belt purposes assessment as the Part One GB Assessment above. 2.10 (which is essentially the same site as BP6) should therefore not have proceeded any further.

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<sup>74</sup> Green Belt Assessment Part Two Draft Report October 2016 Appendix 5 Parcel 2.10

<sup>75</sup> Little Chalfont Parish Council strongly dispute the qualitative assessments of this parcel’s character.

<sup>76</sup> Scoring was provided in Appendix 5 to the Green Belt Assessment Part Two Draft Report October 2016

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- 6.5 Green Belt Development Options Appraisal, November 2017 (Appendix 13)**
- 6.5.1 Following consultation of the Green Belt Preferred Options, in which BP6 was identified as ‘Preferred Option 6’ and proposed for 850-1000 homes<sup>77</sup>, CSBDC prepared a Green Belt Development Options Appraisal, November 2017 (GB Appraisal). The purpose of which was to ‘*provide an interim assessment of the fifteen Green Belt Preferred Options identified in the consultation document against the overall conclusions being drawn from other evidence base documents*’.<sup>78</sup>
- 6.5.2 The GB Appraisal considered Option 6 and included a section called landscape assessment in ‘evidence base to date’. It is not clear if this section is a summary of a separate standalone report or not. Either way this section is a high-level summary of constraints and opportunities. It does not deal with the principle of development, only how development might be accommodated such to reduce its impact; typically, through reduced densities and the establishment of new planting.
- 6.5.3 The GB Appraisal states that development on Option 6 is ‘*constrained by the need to protect existing trees and woodlands, to protect views from the edge of the AONB, and to keep built form out of the dry valley landscape, in line with identified special qualities of the AONB*’.<sup>79</sup> It goes on to describe areas where development might occur and these areas mirror the findings of the Capacity Assessment.
- 6.5.4 Overall and despite not undertaking an assessment of the appropriateness of development within Option 6, the GB Appraisal concludes that Option 6 should be removed from the Green Belt to ‘*secure at least 700 dwellings*’.<sup>80</sup> This number was reduced from the 850-1000 dwellings identified in the Green Belt Preferred Options consultation in response to representations by BCC concerning the educational infrastructure required for 1000 homes.<sup>81</sup>

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<sup>77</sup> Local Plan Green Belt Preferred Options Consultation, October 2016 Chiltern and South Bucks District Councils Page 28

<sup>78</sup> Green Belt Development Options Appraisal, November 2017, Page 4

<sup>79</sup> Green Belt Development Options Appraisal, November 2017, Page 32

<sup>80</sup> Green Belt Development Options Appraisal, November 2017, Page 34

<sup>81</sup> Green Belt Development Options Appraisal, November 2017, Page 33

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- 6.5.5 It states that development would need to be undertaken in accordance with an agreed Development Brief which would secure ‘*Wherever possible retention of woods, trees, hedgerows and landscape features (e.g. dry valley)*’.<sup>82</sup>
- 6.6 Chiltern & South Bucks Stage 2 Green Belt Assessment Strategic Role of the Metropolitan Green Belt in Chiltern & South Bucks, March 2018**
- 6.6.1 The Chiltern & South Bucks Stage 2 Green Belt Assessment Strategic Role of the Metropolitan Green Belt in Chiltern & South Bucks, March 2018 (Strategic GB Assessment) report was prepared by Arup. Its purpose was to inform Part Two of the Green Belt Assessment by considering the performance of the green belt at a macro scale.
- 6.6.2 The report identified four strategic zones of which BP6 is predominantly located within Strategic Zone C - Chilterns Wedge.<sup>83</sup> The Chilterns Wedge is described as predominantly comprising ‘*rural swathes of open countryside and woodlands, which form the hinterland of historic towns such as Amersham, Beaconsfield, Chesham, Chalfont St Peter and Chalfont St Giles...*’<sup>84</sup> (emphasis added)
- 6.6.3 The description goes on to state that ‘*A broad swathe of open countryside, which is relatively free of development, stretches from Gerrards Cross / Chalfont St Peter to the south, northwards to the east of Beaconsfield and west of Amersham, towards Great Missenden / Prestwood. The preservation of this rural setting contributes to the setting and special character of historic towns within the Chilterns Wedge*’.
- 6.6.4 The Strategic GB Assessment finds that the Chilterns Wedge plays a ‘strong’ role in meeting Green Belt Purpose 1, 3 and 4, and that it plays a ‘very strong’ role in meeting Purpose 2.
- 6.7 Green Belt Assessment Part Two Update, April 2019 (Appendix 12)**
- 6.7.1 The Green Belt Assessment Part Two Update, April 2019 was prepared by CSBDC in order to ‘*consider the Part One findings in more detail to inform consideration of whether*
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<sup>82</sup> Green Belt Development Options Appraisal, November 2017, Page 34

<sup>83</sup> The south eastern corner is within Strategic Zone A - London Fringe

<sup>84</sup> Chiltern & South Bucks Stage 2 Green Belt Assessment Strategic Role of the Metropolitan Green Belt in Chiltern & South Bucks, March 2018 Page 25

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*exceptional circumstances exist that would justify adjustments to Green Belt boundaries through the updating of their local plan*'.<sup>85</sup>

- 6.7.2 Area 1.08 was considered but there was no reference to 2.10. It is understood that although the Green Belt Assessment Part Two Draft Report October 2016 has been superseded by this Update, the pro forma attached as Appendix 5 to the draft report (which assessed 2.10) remains a current evidence base document. **(Appendix 12)**
- 6.8 Green Belt Exceptional Circumstances Report, May 2019 (Appendix 14)**
- 6.8.1 The Green Belt Exceptional Circumstances Report, May 2019 was prepared by CSBDC to consider whether exceptional circumstances might exist for the release of land from the green belt.
- 6.8.2 The report is not consistent with the earlier studies as it concludes that parcel 2.10 scores weakly against Green Belt Purpose 3 but moderately against Purpose 2. This contradicts the findings of both the Part One Assessment (which considered GA35) and the Green Belt Assessment Part Two Draft Report October 2016, which originally assessed 2.10. Those assessments considered that the site performed moderately against Purpose 3 (3/5) and more weakly against Purpose 2 (1/5). It is assumed the latter scores are correct and that the contradiction is an error.
- 6.8.3 The conclusion for parcel 2.10 (BP6) is that it *'performs moderately against one purpose of the Green Belt'* and that the *'impacts on the green belt can be mitigated'* and *'Exceptional circumstances therefore exist for the release of this site from the Green Belt'*. It is not clear from the evidence base how the inevitable impacts on the green belt are proposed to be mitigated. It is difficult to see how the loss of openness from the encroachment of 700 new homes into the countryside could be mitigated.
- 6.9 Buckinghamshire County Council Representations (Appendix 15)**
- 6.9.1 BCC raised concerns regarding CSBDC's approach to the removal of green belt land in their representations on the Green Belt Preferred Options.<sup>86</sup> They explained that sufficient land exists within the housing market area (HMA) to deliver the required growth without Green

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<sup>85</sup> Chiltern and South Bucks Green Belt Assessment Part Two Update 2019, 1.3 Page 5

<sup>86</sup> POLate029 Page 3

Belt removal: *‘There is clearly sufficient land outside the Green Belt which is suitable for development within the HMA to meet the objectively assessed needs of the HMA. As such, there are no exceptional circumstances for altering all of the Green Belt boundaries identified within the preferred options document or the wider HMA for the purpose of meeting the housing requirement. Given this situation, a lack of land to meet development needs within the plan area cannot be used as justification for exceptional circumstances which require the alteration of Green Belt boundaries’.*<sup>87</sup> (emphasis added)

- 6.9.2 BCC specifically referenced BP6 and stated that *‘the preferred options proposed at ... Little Chalfont (Preferred Option 6) ... perform well in terms of Green Belt purposes and should remain Green Belt land. The development proposed at these preferred option areas should be planned elsewhere within the housing market area as there are no exceptional circumstances for taking these areas out of the Green Belt’.*<sup>88</sup> (emphasis added) BCC’s current position regarding BP6 is not known.

## 6.10 Summary

- 6.10.1 BP6’s contribution to Green Belt purposes has been assessed as part of the local plan evidence base. The process by which the preferred green belt options were decided was overly complex. As a consequence, the process is difficult to follow and some of the important judgements that have been made along the way are not transparent.
- 6.10.2 At a macro scale, the ‘Chilterns Wedge’ Green Belt area, within which BP6 is located, was found to play a ‘strong’ role in meeting Green Belt Purposes 1, 3 and 4, and a ‘very strong’ role in meeting Purpose 2.
- 6.10.3 General Area (GA) 35 (which covered essentially the same area as BP6) scored ‘medium’ overall against GB purposes in the Green Belt Assessment Part One. However, by the assessment’s own methodology GA35 should have scored at least 4 against purpose 3 and should therefore have been discounted from the assessment process.
- 6.10.4 Parcel 2.10 (the same area as GA35) scored moderately well against Purpose 3 in the Green Belt Assessment Part Two and less well against the other purposes. The Part Two Assessment is considered to have exaggerated the influence of the existing buildings

<sup>87</sup> POLate029 Page 3

<sup>88</sup> POLate029 Page 4

within BP6 and those of the neighbouring village, leading to an inaccurate description of the site's character as 'urban fringe'.

- 6.10.5 Despite it contributing positively to safeguarding the countryside from encroachment exceptional circumstances are considered to exist for the release of BP6 from the Green Belt. This is contested by BCC who consider that BP6 should remain in the Green Belt.

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## 7 Key Landscape Constraints & Potential Impacts

7.1.1 This section addresses the key constraints to the development of BP6 and the potential impacts that may result from its development. It should be read alongside **Figure 3** (constraints: designations), **Figure 5** (constraints: assessments) and **Figure 6** which is a composite of Figures 3 and 5.

### 7.2 Green Belt

7.2.1 The impact of Green Belt loss was raised in over 60% of the representations concerning Option 6; which received the most objections of any options within the Preferred Options Consultation.<sup>89</sup>

7.2.2 The allocation of BP6 would result in the removal of approximately 45.8ha<sup>90</sup> of land from the Green Belt. This land currently makes a positive contribution to the purposes of the Green Belt. In particular it plays an important role in safeguarding the countryside from encroachment. For this role the site scored moderately in both the Part One and Part Two Green Belt Assessments but should have scored higher.

7.2.3 The loss of approximately 45ha of Green Belt land is disproportionate to the amount of development that might be accommodated on the site. This is because approximately 60% of BP6 would be removed from the green belt but would not be developed (approximately 27ha). The proposed development areas identified within the Capacity Assessment cover approximately 18ha.

### 7.3 Chilterns AONB

7.3.1 CSBDC have a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. BP6 is immediately adjacent to the AONB and would harm both the setting of the AONB and views from the AONB (Fp LCF/11/1). Development on BP6 would remove the buffer of open land that separates the AONB from Little Chalfont (Burtons Lane/Loudhams Wood Lane/Village Way) and provides an appropriate setting for

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<sup>89</sup> Preferred Green Belt Options Consultation (Oct-Dec 2016) - Consultation Report and Responses

<sup>90</sup> This is the area stated in the Draft Chiltern and South Bucks Local Plan 2036 - Publication Version Page 171

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the AONB. This setting is particularly effective because of the continuity of landscape character across the AONB boundary.

#### **7.4 Local Landscape Character - Lodge Lane**

7.4.1 The Capacity Assessment shows that if development is to occur within BP6 it is likely to require the development of the former Golf Course land, the expansion of Honours Yard and development along Lodge Lane north of Long Walk. Currently this lane is a characteristic feature of the AONB. Even if the residential areas are not accessed from the Lane (see below), development in such close proximity would have a significant impact on the Lane's rural character.

7.4.2 Representations by Natural England identify Lodge Lane as *'a good example of an AONB laneway'* which *'should not be altered as part of this development'*.<sup>91</sup> The CCB have also raised the potential impacts on this Lane in their representations, where they state that *'Lodge Lane is very scenic rural lane in the Chilterns AONB. Any access or highway 'improvements' to Lodge Lane (eg widening, straightening, signage, traffic lights, street lighting) could harm the AONB, and the Chilterns Conservation Board would be likely to object'*.<sup>92</sup>

#### **7.5 Local Landscape Character - Eastern Dry Valley**

7.5.1 The allocation would result in the loss of an attractive, mostly rural landscape which contributes positively to the setting of Little Chalfont, the AONB and the wider countryside. In particular, the dry valley landform of the site is a key characteristic of the local landscape which has shaped the development of Little Chalfont. To date development within the village has largely avoided the dry valley and the longer valleys north and south of the village. Development of BP6 would be a departure from this characteristic development pattern.

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<sup>91</sup> PORep0227

<sup>92</sup> POLate005

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## 7.6 Local Landscape Character - Woodland Network

7.6.1 The allocation would result in the loss of a rural landscape pattern which is underpinned by an established framework of woodland. In particular, woodland within the site is a key characteristic of the local landscape and forms an important part of the AONB's wider woodland network. Two of the woodlands within the site are identified as having a high sensitivity as part of the Ancient Woodlands HLC type.

7.6.2 If the site was developed, then the current setting to the woodlands and retained trees would be lost. They would no longer be a part of the network of trees, woodlands and pasture which contributes so positively to the attractive local landscape south and east of Little Chalfont. Instead the retained trees would be subsumed within a suburban environment.

## 7.7 LCA 18.3 Little Chalfont

7.7.1 The site's allocation would result in it becoming a part of Little Chalfont and being removed from the Rolling Farmland Landscape Type. The site represents many of the key characteristics of LCA 18.3 and as such its positive contribution to the character of the LCA would be lost.

7.7.2 Development of the site would be contrary to the strategy and vision set by the Landscape Assessment 2011 for LCA 18.3 as it would not conserve and enhance the woodland and farmland '*which contributes to the rural, peaceful character of Little Chalfont Rolling Farmland*'. Development of BP6 would affect a number of landscape and visual receptors identified in the Landscape Assessment 2011 as being sensitive to change, including:

- '*The open farmland and woodland cover (large areas of ancient woodland) which provides enclosure, a backdrop to views and biodiversity value.*
- '*The rural farmed and wooded character of the landscape occurring between the settlement of Little Chalfont and Chorley Wood/ Rickmansworth.*
- '*Stretches lanes/roads through open farmland or enclosed by woodland which retain a rural character*'.<sup>93</sup>

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<sup>93</sup> Chiltern District Landscape Character Assessment, October 2011 Page 95

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## 7.8 Burtons Lane to Doggetts Wood Lane Area of Special Character

- 7.8.1 The development of 700 homes on BP6 is likely to result in a form and density of development that is uncharacteristic and unsympathetic to the Burtons Lane to Doggetts Wood Lane Area of Special Character.
- 7.8.2 The Area's low-density pattern and treed character are highly distinctive and vulnerable to change. The density of development along Loudhams Wood Lane is approximately 7 dph. It is even less along parts of Burtons Lane opposite BP6. Such low densities could not be achieved in BP6 even if the entire site were developed. The 30-35 dph suggested in the Capacity Assessment is far higher than that of neighbouring developments and would be completely incongruous with the Burtons Lane to Doggetts Wood Lane Area of Special Character.
- 7.8.3 An access point from Burtons Lane would require the removal of roadside vegetation. A new or enlarged access (at Homestead Farm, see also 7.9.4), together with visibility of development across the wider site, would add further harm to the Area of Special Character.

## 7.9 Access

- 7.9.1 The feasibility of the preferred access routes shown in the Capacity Assessment is highly questionable. In their representations Bucks CC have stated that development on BP6 is *'unlikely to be supported by the Highway Authority unless a suitable access can be achieved from Burton's Lane, as there are likely to be issues with visibility onto Lodge Lane and the width of Lodge Lane itself'*.<sup>94</sup>
- 7.9.2 Any of the three access points off Lodge Lane would be entirely inappropriate. Significant harm to the character of Lodge Lane and the adjacent AONB would result from the traffic generated by 700 new homes and the infrastructure/upgrades required to accommodate it. Although two of the preferred access points from Lodge Lane are 'existing' they would likely require upgrading to accommodate additional traffic flows.
- 7.9.3 Representations made by Loudham Wood Lane Management Company (LWLMC) (PORep1860) explain that access from Loudham Wood Lane is unfeasible given that it is a

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<sup>94</sup> POLate029

private road. LWLMC have indicated that they would '*not be willing to grant any right of way over the land that it owns*'.<sup>95</sup> Village Way and Long Walk are also private roads, although neither have been identified as preferred access points.

7.9.4 The majority of the proposed development areas (Capacity Assessment) are shown to be accessed from either Loudham Wood Lane or Lodge Lane. As neither route is considered suitable, access to these areas would have to come from Burtons Lane. To access the eastern parts of the site from Burtons Lane would necessitate crossing the dry valley landscape which would be inappropriate in landscape terms and probably ecological terms too - as it would impact on either Ancient Woodland or Priority Habitats.

7.9.5 The trainline north of the site presents an additional barrier to access and connectivity between BP6 and the rest of the village.

## 7.10 Developable Land & Density

7.10.1 It is highly unlikely that 700 dwellings can be accommodated on the site whilst retaining '*important landscape features such as woodland, hedgerows and the dry valley*' as sought by Draft Policy BP6.<sup>96</sup> This level of development is also in conflict with the Capacity Assessment where it states, '*the key landscape and visual characteristics must be retained and enhanced*' as BP6's valued characteristics will not be retained if they are surrounded by development let alone enhanced.

7.10.2 The Capacity Assessment suggested that '*between 547-638 dwellings might be accommodated*' at a density range of 30-35dph. This means that either larger areas of land or a higher density (to those considered in the Capacity Assessment) would be required to deliver 700 dwellings within BP6.

7.10.3 In turn this would mean a greater area of land in the dry valley would be impacted upon than anticipated in the Capacity Assessment, with less room for mitigation planting/ woodland buffers. And/or a development pattern and density would be delivered that is even more incongruous with the existing settlement (Burtons Lane to Doggetts Wood Lane Area of Special Character) and the AONB than the 30-35 dph anticipated in the Capacity Assessment.

<sup>95</sup> PORep1860

<sup>96</sup> Draft Chiltern and South Bucks Local Plan 2036 - Publication Version June Page 170

## 7.11 Ecological Constraints

- 7.11.1 Development within BP6 has the potential to directly impact upon the woodland habitats within the site, which include two areas of Ancient Woodland and other deciduous woodland that is identified as Priority Habitat (**Figure 3**). Indirect impacts may occur in relation to the surrounding woodland habitats.
- 7.11.2 Representations by Natural England state that *‘things to consider as part of any development should include changes to hydrology, increased nutrient (from dogs), predation of wild birds by cats, increased visitor pressure, and non-native plants infiltrating the woodland (e.g. residents dumping garden waste)’* and that *‘on a site this size there will be significant impacts to biodiversity if not appropriately managed’*.<sup>97</sup>
- 7.11.3 The Woodland Trust (TWT) have stated that they are *‘extremely concerned about option 6’* and have objected to its inclusion within the Local Plan.<sup>98</sup> TWT explains how development adjacent to Ancient Woodland can impact upon it *‘adjacent housing leads to an increase in dumping, littering and predation by domestic cats. Unplanned increased public access to these irreplaceable habitats can be very damaging’*.<sup>99</sup>
- 7.11.4 TWT have also raised concerns to the development of BP6 stating additional factors such as *‘Noise and light pollution interfere with interactions between species, affecting foraging and predation, reducing breeding success and thereby affecting on-going population viability. Disturbance may, therefore, lead to species being eliminated from woods’*.<sup>100</sup>
- 7.11.5 The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) identify a number of ecological issues with BP6 and have stated in their representations that *‘development at this site is problematic with large areas of the site being not appropriate for development. All non-developable areas should be retained within the Green Belt’*.<sup>101</sup>
- 7.11.6 BBOWT identify that *‘Aerial photography observation suggests some of the fields proposed for development are semi-improved grassland or maybe even better’* and that *‘The site*

<sup>97</sup> PORep0227

<sup>98</sup> PORep2607

<sup>99</sup> PORep2607

<sup>100</sup> PORep2607

<sup>101</sup> PORep2976

*includes farmland, grassland and woodland that are likely to be used by populations of several species of bird that are priority species and/or Red/Amber listed Birds of Conservation Concern'. BBOWT have a particular concern regarding the potential impacts on Ancient Woodland and deciduous woodland priority habitat and considers that considerable buffers around these habitats would be required (at least 30m to Ancient Woodland, at least 15m to priority habitat).*

7.11.7 In addition to its woodland habitats, BP6 lies within the Impact Risk Zone to the Frogmore Meadows Site of Special Scientific Interest (SSSI). Indirect impacts on the SSSI may result from the increased population and subsequent recreational demands brought about by BP6 development.

## 7.12 Desirability of Employment Land

7.12.1 Draft Policy BP6 requires a new shopping parade of at least 500m<sup>2</sup> to be delivered as part of any development proposal. Buckinghamshire Thames Valley Local Enterprise Partnership questioned the desirability of the site to new businesses in their representations, stating that *'although there is existing employment on this site, it does not appear to be a natural location for employment wans [and] would need significant infrastructure intervention to appeal to developers'*.<sup>102</sup>

## 7.13 Ownership

7.13.1 BP6 is in multiple ownership. At least one of the owners (Pucks Paigles) strongly opposes the development and is unlikely to want to sell their land. This would remove approximately 3 ha from the gross site area and potentially restrict the choice of access points from Burtons Lane.

## 7.14 Summary and Overall Conclusion

7.14.1 This appraisal has identified a number of constraints to development within the BP6 site. As a result of these constraints it is considered that 700 dwellings could not be satisfactorily accommodated on the site without significant landscape harm, as it would:

<sup>102</sup> PORep2832

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- Remove 45.8ha of land from the Green Belt which currently makes a positive contribution to the purposes of the Green Belt by safeguarding the countryside from encroachment.
  - Harm both the setting of the AONB and views from the AONB by removing the buffer of open land that separates the AONB from Little Chalfont and which provides an appropriate setting for the AONB through the continuity of landscape character across the AONB boundary into BP6.
  - Harm the rural character of Lodge Lane from development within a close proximity to it and the traffic generated by 700 new homes, and the infrastructure/upgrades required to accommodate it.
  - Result in the loss of an attractive, mostly rural landscape which contributes positively to the setting of Little Chalfont, the AONB and the wider countryside.
  - Develop across the dry chalk valley and therefore depart the village's characteristic development pattern which avoids surrounding valley landscapes.
  - Detract from the current rural setting to the woodlands which are characteristic of the local landscape and include Ancient Woodlands which are identified as having a high sensitivity as part of the Ancient Woodlands HLC type.
  - Result in BP6 being removed from the Rolling Farmland Landscape Type.
  - Would be contrary to the strategy and vision set by the Landscape Assessment 2011 for LCA 18.3 as it would not conserve and enhance the woodland and farmland '*which contributes to the rural, peaceful character of Little Chalfont Rolling Farmland*'.
  - Be at risk of harming characteristics of LCA 18.3 identified in the Landscape Assessment 2011 as being sensitive to change e.g. '*Stretches lanes/roads through open farmland or enclosed by woodland which retain a rural character*'.
  - Result in a form and density of development that is uncharacteristic and unsympathetic to the Burtons Lane to Doggetts Wood Lane Area of Special Character.
  - Be difficult to access without causing substantial harm to the character of Lodge Lane and/or Burtons Lane and the neighbouring AONB/Area of Special Character. In addition, harm would occur from adding new roads within the dry valley landscape.

- Require a greater area of land and/or a higher density than anticipated in the Capacity Assessment to achieve 700 homes.
- Directly impact upon woodland habitats within the site, which include two areas of Ancient Woodland and other deciduous woodland that is identified as Priority Habitat.

7.14.2 Overall in landscape terms BP6 is considered to be unsuitable for residential development as it would result in significant landscape and visual harm and be at risk of harming components within the landscape which hold high landscape and ecological value.

## GLOSSARY AND ABBREVIATIONS

AONB	Area of Outstanding Natural Beauty
Cumulative effects	Cumulative effects are additional or in combination effects that result from changes caused by a development in conjunction with other past, present, or reasonably foreseeable actions.
EIA	Environmental Impact Assessment
ES	Environmental Statement
GLVIA	Guidelines for Landscape and Visual Impact Assessment, Third Edition, published jointly by the Landscape Institute and Institute of Environmental Management and Assessment, 2013.
HLC*	Historic characterisation is the identification and interpretation of the historic dimension of the present-day landscape or townscape within a given area. HLC is the term used in England and Wales, HLA is the term used in Scotland.
Indirect effects*	Effects that result indirectly from the proposed project as a consequence of the direct effects, often occurring away from the site, or as a result of a sequence of interrelationships or a complex pathway. They may be separated by distance or in time from the source of the effects.
Key Landscape Characteristics	Those combinations of elements which are particularly important to the current character of the landscape and help to give an area its particularly distinctive sense of place.
Landscape character*	A distinct and recognisable pattern of elements that occurs consistently in a particular type of landscape and how this is perceived by people. It reflects particular combinations of geology, landform, soils, vegetation, landuse and human settlement. It creates the particular sense of place of different areas of the landscape.
Landscape designations	Areas protected by law or through planning policies for reason of their landscape qualities e.g. National Parks, AONB and Local Landscape Designations.
Landscape effects	Effects on the landscape as a resource in its own right. Change in the elements, characteristics, character, and qualities of the landscape as a result of development.
Landscape elements	A component part of the landscape, such as trees, hedges, buildings and ponds.
Landscape features	Prominent eye-catching elements, e.g. tree clumps, wooded hill tops, and church towers/spires.
Landscape quality (or condition)*	Based on judgements about the physical state of the landscape, and about its intactness, from visual, functional, and ecological perspectives. It also reflects the state of repair of individual features and elements which make up the character in any one place.
Landscape qualities	Term used to describe the aesthetic or perceptual and intangible characteristics of the landscape such as scenic quality, tranquillity, sense of wildness or remoteness. Cultural and artistic references may also be described here.
Landscape resource	The combination of elements that contribute to landscape context, character, and value.
Landscape value*	The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a wide variety of reasons.
LCA	Landscape Character Area – single unique areas that are the discrete geographical areas of a particular landscape type.
LCT	Landscape Character Type – distinct types of landscape that are relatively homogeneous in character. They are generic in nature may occur in different areas in different parts of the country.
LVIA	Landscape and Visual Impact Assessment.
Magnitude*	A term that combines judgements about the size and scale of the effect. The extent of the area over which it occurs, whether it is reversible or irreversible and whether it is short or long term in duration.
Mitigation	Measures including any process, activity, or design to avoid, reduce, remedy or compensate for adverse environmental impact or effects of a development.

NCA	National Character Areas. Landscape character areas as defined for the whole of England.
Photomontage*	A visualisation which superimposes an image of a proposed development upon a photograph or series of photographs.
Receptor	Physical or perceptual landscape resource, special interest, viewer group or individuals that may be affected by a proposal.
Residual effects	Potential environmental effects, remaining after mitigation.
Residential Visual Amenity*	A collective term describing the views and general amenity of a residential property, relating to the garden area and main drive, views to and from the house and the relationship of the outdoor garden space to the house.
Scale Indicators*	Landscape elements and features of a known or recognisable scale such as houses, trees and vehicles that may be compared to other objects where the scale of height is less familiar, to indicate their true scale.
Sense of Place (genius loci)*	The essential character and spirit of an area: genius loci literally means 'spirit of the place'.
Sensitivity*	A term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.
Temporary or permanent effects	Effects may be considered as temporary (limited duration and reversible) or permanent (irreversible). Some development may also be reversible.
Tranquillity*	A state of calm and quietude associated with peace, considered to be a significant asset of landscape.
Type or Nature of Effect	Whether an effect is direct or indirect, temporary or permanent, positive (beneficial), neutral or negative (adverse) or cumulative.
Visual amenity*	The overall pleasantness of the views people enjoy of their surroundings which provide an attractive visual setting or backdrop for the enjoyment of activities of the people living, working and recreating, visiting or travelling through an area.
Visual effect*	Effects on specific views and on the general visual amenity experienced by people.
Visualisation*	A computer stimulation, photomontage, or other technique illustrating the predicted appearance of a development.
ZTV –*	Zone of Theoretical Visibility. A map, usually digitally produced, showing areas of land within which a development is theoretically visible.

Note: Descriptions marked with an asterisk are identical to those provided in the Third Edition Guidelines for Landscape and Visual Impact Assessment glossary or text.

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