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Land at Little Chalfont

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Chilterns Area of Outstanding Natural Beauty Management Plan 2014-2019

A Framework for Action





This Management Plan complies with the following legislation and guidance:

- The Countryside and Rights of Way Act 2000, Part 4 Section 89
- The Strategic Environmental Assessment Regulations (SI 1633) 2004
- The Conservation (Natural Habitats etc.) Regulations 1994 (as amended by The Conservation (Natural Habitats etc.) (Amendment) Regulations 2007)
- Guidance for the Review of AONB Management Plans published by The Countryside Agency 2006

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Chilterns Area of Outstanding Natural Beauty Management Plan 2014 - 2019

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A Vision for the Chilterns Area of Outstanding Natural Beauty

The Management Plan is based on a vision for the Chilterns AONB in which:



Conserve and enhance the natural beauty

- Its special and unique character is conserved, cared for and cherished for future generations to enjoy.
- The importance of taking a landscape-wide approach to its management is accepted, which combines an understanding of its natural, historical, cultural, social and economic characteristics.
- The setting of the Chilterns is valued and protected by ensuring development adjacent to the AONB also respects its national importance.
- The historic and cultural environment of the Chilterns is conserved and appreciated widely.



Increase understanding and enjoyment

- Opportunities to expand, enhance and enjoy natural beauty are created and taken.
- Local people and visitors can easily appreciate and enjoy its special qualities.
- Those who live, work, visit and enjoy the area also want to be its custodians and stewards.
- The knowledge, skills and resources needed to manage the AONB as a nationally important landscape are readily available.
- The potentially adverse impacts of pests, diseases and climate change are avoided or minimised.



Foster social and economic well-being

- The health and well-being of local people and visitors is enhanced by their enjoyment of the area.
- The potential of a high quality natural environment to provide a high quality living environment for local communities and businesses is realised.
- There is a thriving market for environmentally-sustainable local produce which contributes to the viability of land management and enterprises.

The Chilterns Area of Outstanding Natural Beauty should be an area where:



Natural beauty

- Chalk grassland is more extensive, creating more open downland with thriving populations of its special wildlife.
- Woodland is well-managed and productive, growing high quality timber as well as providing natural spaces for recreation and a home for wildlife.
- Chalk streams have enhanced flows along their natural river beds and provide a healthy environment for their specialised wildlife.
- Local farms are thriving businesses which help to maintain landscapes and wildlife habitats.
- The historic environment, including the numerous hillforts, is conserved, enjoyed and appreciated.
- Common land is valued, enjoyed and well-managed with larger areas of open landscape and better conserved heritage features.
- 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.
- More new buildings are constructed using traditional materials and vernacular architectural styles.
- There is a place for modern and innovative building and structural design which respects the setting and wider landscape.

Understanding and enjoyment

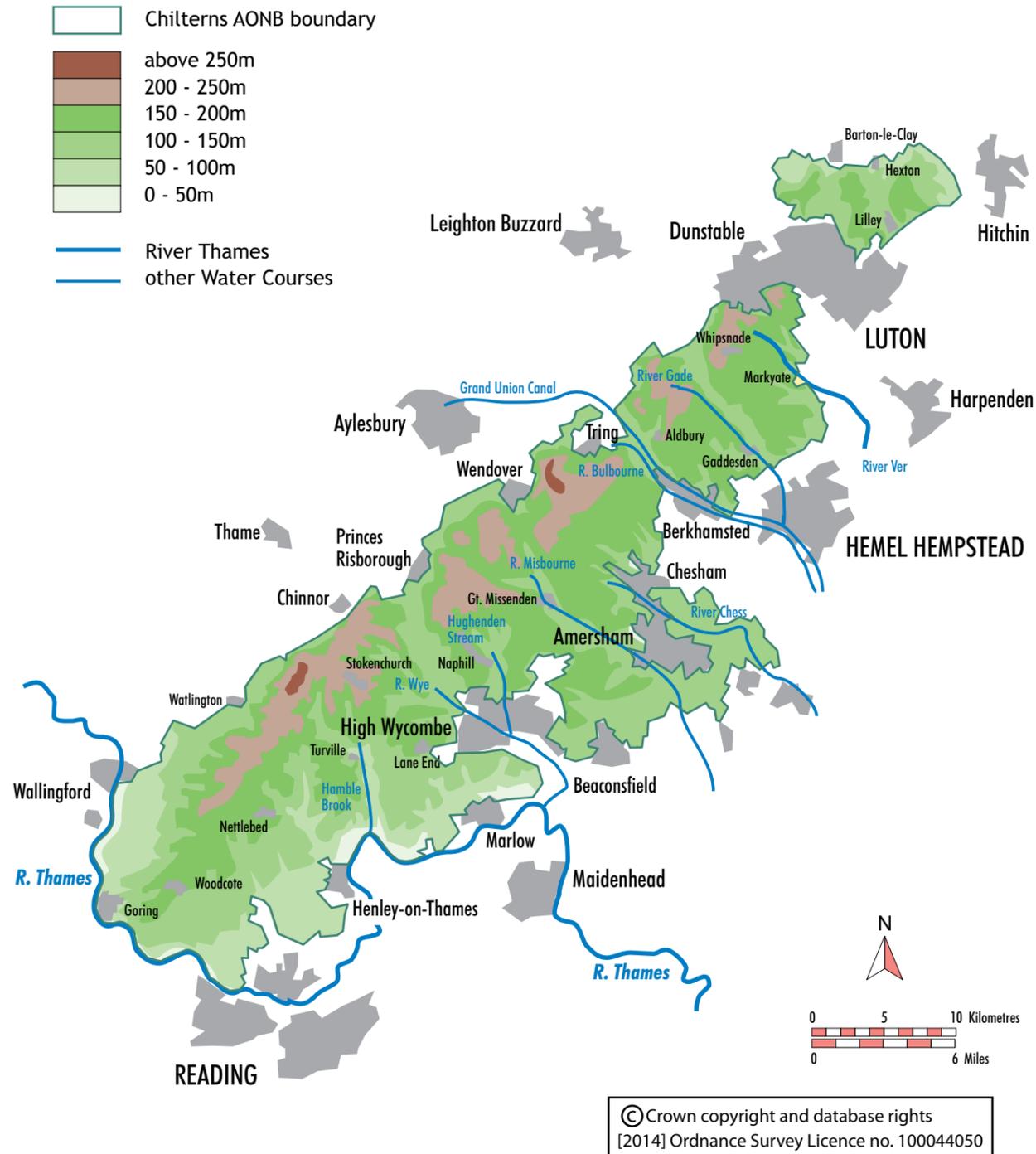
- The River Thames and its valley provide attractive landscape, recreational opportunities and enhanced wildlife habitat.
- The public rights of way, including the Ridgeway and Thames Path National Trails, are well-managed and easily used providing attractive networks of routes popular with walkers, cyclists and horse-riders.



- High quality visitor information and environmental education programmes are widely available.
- More local people and visitors become active volunteers to help care for all parts of the Chilterns Area of Outstanding 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, over-flying aircraft and trains.
- The impact of transport infrastructure and traffic is reduced, with more people walking, cycling and using public transport.



The Chilterns Area of Outstanding Natural Beauty



Introduction

The special qualities of the Chilterns AONB



*Kingwood Common
Oxfordshire*

1. In 1965 an area of 800 sq kms of the Chiltern Hills was designated as an Area of Outstanding Natural Beauty (AONB). Later, following a review of the boundary the AONB was enlarged to 833 sq kms in 1990. Natural England has recently lifted its de facto moratorium of the review of boundaries of AONBs and there may well be an opportunity during the lifetime of this Plan to consider proposals to change the existing boundary.
2. 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.
3. There is an extensive network of protected sites within the AONB, including 63 Sites of Special Scientific Interest (SSSI), three National Nature Reserves and three European-designated Special Areas of Conservation. In 2012 98.7% of the Chilterns' SSSIs were in favourable or recovering condition.
4. The Chilterns is one of the most densely wooded parts of the UK with nearly 22% woodland cover of which two thirds is ancient woodland - the highest proportion in the country. The AONB also has a nationally-important concentration of high quality chalk grassland with over 700 ha.
5. Commons are amongst the most characteristic features of the AONB – part of its social and cultural heritage – accessible green places for recreation and public enjoyment and home to a wide diversity of wildlife. Today there are

- 2016 ha of registered common land in the AONB – around 2.4% of the total area.
- Some of the Chilterns' most distinctive natural features are its chalk rivers and streams, fed by groundwater from the chalk aquifer. A globally scarce habitat, chalk rivers support a range of specialised wildlife and in the Chilterns provide a home for the threatened water vole. Another significant water feature of the area, the River Thames, forms much of the southern boundary of the AONB.
 - The Chilterns is possibly the most heavily-visited landscape in the UK with 55 million leisure visits a year¹. Visitors come to enjoy over 2000 km of public rights of way, the Ridgeway and the Thames Path National Trails, the Chiltern Way and the recently opened Chilterns Cycleway and many more special routes.
 - The area is rich in history with ancient man-made features scattered through the countryside and a legacy of grand houses and designed landscapes from the 17th and 18th centuries. There are 122 Scheduled Ancient Monuments in the AONB and 15 parks and gardens on English Heritage's register. There are 2,149 listed buildings, of which 140 are Grade I and II*, and 94 Conservation Areas.

The Chilterns Conservation Board

- The Chilterns Conservation Board was established by Parliamentary Order in 2004. It is one of the first two Conservation Boards (the other is for the Cotswolds) set up under the Countryside and Rights Of Way (CROW) Act 2000 which enabled the establishment of independent statutory bodies to manage AONBs.
- The Board has two statutory purposes:
 - to conserve and enhance the natural beauty of the AONB; and
 - to increase the understanding and enjoyment of the special qualities of the AONB.

- In fulfilling these purposes, the Board has a duty to seek to foster the economic and social well-being of local communities within the AONB, without incurring significant expenditure.
- In practice, where there is a conflict between conserving the special qualities of the Chilterns and its use or enjoyment, the Board will give greater weight to its conservation.
- There are 27 members of the Board: 13 are appointed by the 13 local authorities in the Chilterns AONB, eight are appointed by the Secretary of State for Environment, Food and Rural Affairs and six are elected by parish and town councils in the AONB.
- The Board has a small staff team based in Chinnor in Oxfordshire. It is also assisted by volunteers who lead guided walks, give talks, help at events and carry out project work.

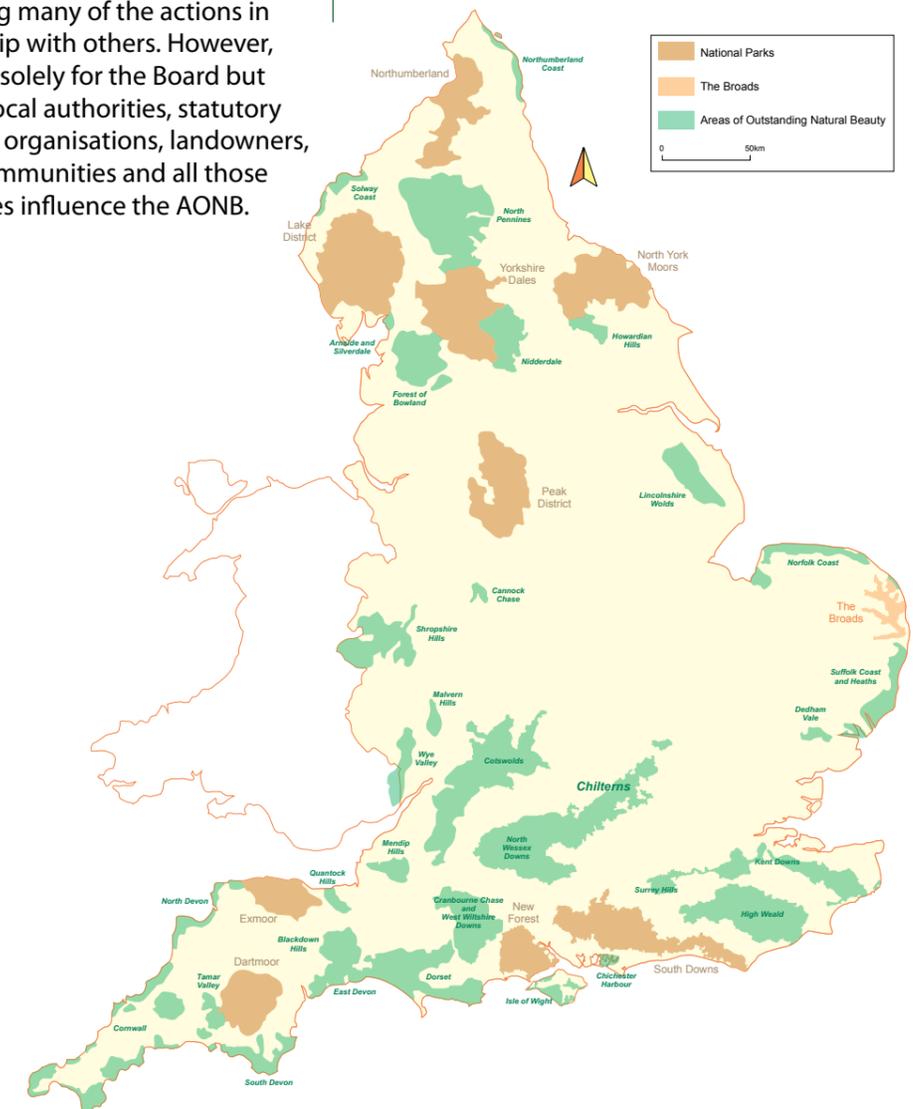
Chilterns AONB Management Plan

- The CROW Act places a duty on all local authorities which include an AONB, and Conservation Boards, where they exist, to produce a plan which outlines their policies for the management of the AONB and how they will carry out their functions in relation to it. Management plans must be reviewed at least every five years. The previous Plan covered the period 2008-13.
- An ongoing difficulty is monitoring the actual changes to the landscape and how they affect its quality. The Conservation Board prepares an annual State of the Environment Report based on a number of locally selected indicators and using the best available information. Ideally such a report would be based on a combination of local and national indicators to enable comparisons with other areas using up to date information. It is an objective of the new Plan to

¹ 2007 Chilterns Leisure Visitor Survey

- increase the amount of environmental data on the AONB which will be published in the annual State of the Environment Report and will contribute to monitoring of the Plan's progress.
- The Management Plan for the AONB for 2014-2019 contains a number of broad aims for the management of the Chilterns AONB. The more detailed policies and actions in the Plan outline how these aims will be achieved by the Board and all other parties with an interest in the AONB.
- The aims, policies and actions in the Plan have been formulated by the Board in consultation with a wide range of organisations and individuals. During the Plan's lifetime the Board will guide its implementation and will be responsible for undertaking many of the actions in it, in partnership with others. However, the Plan is not solely for the Board but is a guide for local authorities, statutory agencies, local organisations, landowners, businesses, communities and all those whose activities influence the AONB.

- For clarification, the implementation of the actions identified in the Plan for the AONB will require the collaboration of many organisations - it is not a work programme for the Chilterns Conservation Board alone. Inevitably, the programme will be affected by the priorities of each partner and availability of resources. In recent years many of those bodies which will take a major role have less public funding available, a trend likely to continue for some time. This shortage of resource combined with an increased political emphasis on economic growth rather than environmental conservation will, inevitably, restrict the level of ambition and delivery that can be achieved in practice.



Global, national and regional context of the AONB

1. The Chilterns AONB is one of 46 AONBs in the UK, which together cover 18% of the countryside. The AONB designation was created by the National Parks and Access to the Countryside Act of 1949, which also established the National Park designation. The aim was that the two designations would protect the finest countryside in England and Wales. In June 2000 the Government confirmed that AONBs and National Parks have the same level of landscape quality and share the same level of protection.
2. AONBs are part of the global network of protected landscapes. The International Union for the Conservation of Nature and Natural Resources (IUCN) has six management categories covering all types of protected areas. AONBs (and National Parks) fall into Category V – landscapes managed mainly for conservation and recreation.
3. The Chilterns Conservation Board is a member of Europarc, the umbrella organisation for Europe's protected areas. As a protected landscape the Chilterns AONB, along with other AONBs, is playing a key role in the implementation of the European Landscape Convention, ratified by the UK in 2006. The Convention aims to improve the protection and management of important landscapes and to increase co-operation across Europe.
4. The Board is an active member of the National Association for AONBs which represents the interests of the designation and those bodies responsible for them at a national level.
5. The Board also participates in the South East Protected Landscapes group to develop collaborative initiatives across the region and to develop working relationships with a range of regional partners. There is further scope for collaborative working in the East of England.

Influences on the natural beauty of the Chilterns AONB

Development

1. There has long been pressure on the Chiltern Hills for development and for changes in land use which would have a deleterious effect on the quality of the landscape. It was partly these pressures which led to the designation of the area as an AONB in 1965. In more recent times the pressures have grown, leading to a greater-than-ever need for a comprehensive and widely-implemented Management Plan.
2. The recent introduction of the new National Planning Policy Framework to encourage more development is intended to relax planning policies and controls to stimulate house building in particular. Great care will be needed to ensure that this does not lead to a proliferation of designs which do not reflect the traditional Chilterns styles and use of materials. A return to the universal design prevalent during much of the 20th century would be greatly damaging to the AONB. The national policies highlight the need to ensure AONBs are given suitable protection, which will need vigilance and persistence on the part of local planning authorities.
3. 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.
4. The specific impact of High Speed 2 on the Misbourne Valley and communities of Great Missenden, Hyde Heath, South Heath and Wendover will be severe. The current proposed alignment and design are far from the best available. If Parliament decides the railway should go

ahead a full-length bored tunnel would be the least damaging option.

5. The threat of a significantly greater number of overflying aircraft is growing as a result of the plan by the operators of Luton airport to double the number of passengers using the airport from 10 million per annum to nearly 20 million.
6. Currently there are no plans to locate wind farms in the Chilterns or for 'fracking'. However that may change and such activities may be sited immediately adjacent to the AONB. Any proposal should be assessed in terms of its impact on the AONB and unless it can be proven that the environmental impacts are acceptable there should be a presumption in favour of refusal.

Visitor pressure

7. Sitting on London's doorstep, and immediately adjacent to several large towns, the Chilterns provides highly valued landscapes and places to escape to. It is a place which has to cope with growing populations and increasing traffic levels as well as pressures for development which come right up to the boundary. Luton, Aylesbury and the Thames Corridor have been identified as part of growth areas by the Government and will see population increases in the coming years, which will result in a greater number of people travelling through the AONB and using it for recreation. The consequent demand for road improvements and greater infrastructure at countryside sites could have a damaging effect on the AONB so needs to be appropriately managed.

Use of water

8. Greater development close to the Chilterns, and some inevitable development within the area, will lead to more consumption of scarce water resources. Abstraction of water for domestic use already has an impact on Chilterns streams and rivers and it is vital that public demand for water is managed sustainably.

Changes in farming

9. The landscape of the Chilterns is dominated by farmland and woodland, and changes in these land uses have a major influence on the natural beauty of the area. The reform of the EU Common Agricultural Policy and the introduction of new agri-environment schemes in the UK are affecting farming. The vagaries of the climate are proving an ever increasing challenge with extremes of weather becoming more frequent with potentially significant consequences. Experience has shown that when farming is more profitable there is greater investment in environmental conservation. The pressure on profit margins together with a relative decline in grant-aid is likely to have a negative impact on some aspects of the farmed environment.
10. Loss of traditional management practices - in particular grazing - and the almost total cessation of 'commoning' (the exercise of common rights) have affected the open habitats often associated with common land.

Changes in forestry

11. The long term decline in the market for UK timber has had a pronounced effect on the Chiltern woodlands, with many suffering from a lack of management. The ageing beech woodlands no longer produce significant volumes of timber and are more valuable as places for recreation than as a part of the rural economy. However, the growing demand for wood as a renewable fuel has stimulated the improved management of some woodlands.

Pests and diseases

12. The number of potentially damaging pests and diseases threatening woodlands, in particular, has grown significantly. The long standing problem of damage by grey squirrels and deer is now compounded by the threat from a number of diseases including ash dieback, acute oak decline and sudden oak death. These diseases will dramatically change the tree species composition of local woods and will result in other species being planted which are likely to be less vulnerable to damage and also may cope better with changes in climate. The aim is to create more resilience against the effects of pests and diseases through the choice of species and management prescriptions. For example this might mean more planting of lime, walnut and douglas fir.

Chenies Manor near Amersham



Cross-cutting themes of the Management Plan

A number of important themes, which will have a significant influence on the management of the AONB over the next five years, cut across all the chapters of the Plan. They are:

- climate change
- social inclusion
- health and well-being
- lifelong learning
- ecosystem services
- environmental sustainability

Many of these themes are integrated in the concept of green infrastructure (GI), which aims to provide a high quality environment which contributes to the well-being of local communities.

1. Climate change

A changing global climate, principally caused by human activities, is now regarded as an indisputable fact by the Intergovernmental Panel on Climate Change (IPCC)². How much global temperatures will rise and how quickly are still under debate, but there is a broad consensus of opinion on the likely changes to the climate of southern England, and therefore the Chilterns AONB, over the next few decades. The likely long term changes are:

- summers will become warmer and drier
- winters will become milder and wetter
- storm events will become more frequent
- weather generally will become more unpredictable

Even short to medium term climatic cycles may be uncertain but there is consensus on the likely long term trends.

² IPCC Fourth Assessment Report: Climate Change (2007)

These changes have the potential to affect the landscape, wildlife and communities of the Chilterns in many ways. For example, in future the Chilterns woods may well have less beech and ash (if any) and more lime, sycamore and even walnut.

The range of crops grown by farmers will change and there may be more growing of biofuels, although concerns over the security of food supplies may affect that market. Flows in rivers and streams could become more erratic and there will be changes in the fauna and flora of all habitats. The impact of tourism is particularly unpredictable. People may decide to holiday in the UK rather than to go abroad if the summer weather becomes warmer and sunnier but, as in recent years, poor weather may lead to fewer holidays taken in the UK.

2. Social inclusion

The Chilterns AONB is a national treasure, protected for all to enjoy and it receives millions of visits every year. Despite this, there are many who could benefit from the area and yet remain unaware of what it has to offer, or who face obstacles in accessing it. Ensuring that as wide an audience as possible understands the special qualities of the AONB and takes an active part in enjoying and caring for it is essential to the future of the area. The Management Plan seeks to achieve this in a variety of ways including reaching out to those in urban areas close to the Chilterns, improving public participation in conservation activities and increasing awareness of the AONB and its special qualities amongst those who are not regular visitors at the moment.

3. Health and well-being

Rising obesity levels and the ever-increasing costs of healthcare have prompted a much greater emphasis on preventative health solutions. There is an increasing perception of the countryside, and green space in general, as a place which offers tangible benefits to health and well-being. The value of protected countryside, like AONBs, in providing walking, cycling and riding routes and a tranquil rural escape from stressful lives is increasingly being seen in economic and social terms as well as environmental.

4. Lifelong learning

Lifelong learning is the concept of providing people with learning opportunities at all ages and in many different contexts: at work, at home and during leisure pursuits as well as through more formal channels such as adult education. It is a Government priority and one which ties in with the Conservation Board's primary purpose of increasing understanding and enjoyment of the Chilterns AONB. With greater understanding comes a sense of ownership and of stewardship. The popularity of the natural environment amongst the public combined with the resources that the AONB offers such as wildlife, special habitats, history and built heritage creates many opportunities to stimulate understanding, develop skills and encourage creative responses.

5. Ecosystem services

The environment provides many services in the form of wildlife, water, minerals, public enjoyment, flood protection, food, timber and other natural resources. This wide ranging and interlinked array of services is now being given better and more formal recognition in national environmental policies. A primary purpose of this increased emphasis is to ensure that any proposal which has an environmental impact results in the assessment of those impacts on the full range of ecosystem services and a full value thereby being accorded to those services.

6. Environmental sustainability

The Earth's resources, in simple terms, fall into those which can be renewed and those which cannot and will be exhausted unless their use ceases. The favoured approach is to give priority to minimising use of non-renewable resources and increasing reliance in those which are renewable. The most obvious examples are in the field of energy with more energy conservation, reduced reliance on fossil fuels and greater generation of solar power. It is not anticipated that wind turbines will be located in the AONB. Much greater use will be made of wood fuel, not least as very large volumes are likely to be available if, and when, the area is affected by ash dieback.

Section 1

Conserving and enhancing natural beauty



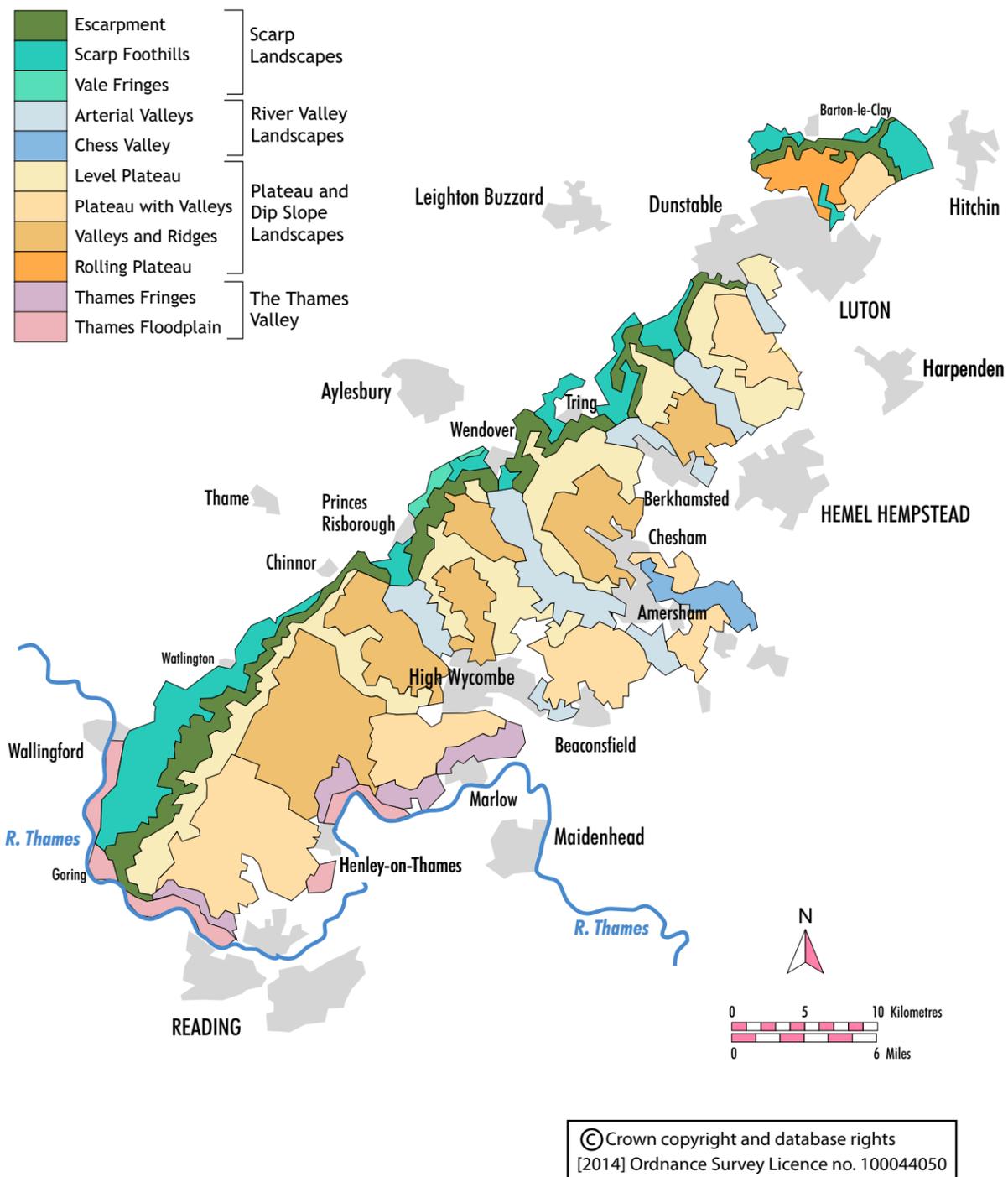
The primary purpose of designating an area of countryside as an AONB is to conserve and enhance the natural beauty of its landscape. In this sense, the term 'natural beauty' refers not only to the scenic qualities of the landscape but to all those other elements which together produce the special character of the AONB. These elements include wildlife and man-made features such as its archaeological and built heritage.

This section seeks to unpick the special qualities of the Chilterns AONB and to define the key issues which are affecting them. It is divided into chapters reflecting all the components which combined create the unique sense of place of the Chilterns, namely:

- Landscape
- Farming, forestry and other land management
- Biodiversity
- Water environment
- Historic environment
- Development

Dunstable Downs

Landscape character



Landscape

Introduction



1. The landscape of the Chiltern Hills is defined by the chalk escarpment which runs from Goring-on-Thames north-eastwards to Hitchin - a distance of 50 miles. At its highest point, near Wendover, it reaches nearly 900 feet. The steep scarp slope faces to the north west; the dipslope 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.¹ To the south and west it is the Thames Valley which provides a natural boundary.
2. Whilst all of the Chiltern Hills are within a single National Character Area (No.110)² as defined by Natural England, not all of the Chiltern Hills have been designated as an Area of Outstanding Natural Beauty. A central core deemed to contain the finest landscape and which best exhibits

the Chilterns landscape character is currently within the AONB. However, in several places the Chilterns landscape extends beyond the area currently designated as AONB and there may be a case for re-considering whether some of this landscape should also be designated.

3. On a global scale chalk is a rare form of geology, laid down during the Cretaceous Era (65 - 100 million years ago), and is most commonly found in the south and east of England and north-west France, but almost nowhere else. The Chilterns shares many characteristics with other chalk landscapes in the Surrey Hills, North and South Downs, North Wessex Downs, Wiltshire and beyond into Dorset. A large proportion of these special landscapes have been designated as either Areas of Outstanding Natural Beauty or National Parks.

¹ *The Chilterns Landscape: Countryside Commission CCP392 1992*

² *National Character Area Profile: 110 Chilterns (Natural England 2013)*

4. Chalk is an unseen geology with few natural outcrops and is generally only exposed in quarries, now largely redundant. It was little used for construction, except in the manufacture of cement, and only the relatively hard forms of chalk known as Totternhoe Stone and Clunch were used in local buildings.
5. The landscape is a combination of the landform created by underlying chalk and the land uses and buildings on its surface, which owe more to the clay and flint which overlie it. The heavy clay soils support extensive woodland cover and mixed farming on mostly medium quality (Grade 3) land. There are also deposits of fire clay, suitable for commercial brickmaking, and flint which lends such distinction to all forms of building from churches to cottages.
6. The landscape has largely been shaped by farmers and foresters and remains an ancient landscape with features from many ages. Even today, field and hedgerow patterns can be traced back many centuries as can most of the lanes, woodland banks and parish boundaries.
7. It is a landscape of many hidden quarters, of enclosures and surprise views, of dark beech woods and open downland. It is its variety and timelessness which give it such charm and places such a premium on maintaining those special qualities.
8. Climate change will result in some significant changes to the landscape by changing habitats and land uses, but over a relatively long timescale with few noticeable changes in the short term. Over a period of 50 years or more the most noticeable changes are likely to be an altered species composition of woodland with less beech and a greater variety of arable crops better suited to warmer conditions. Those qualities which make the Chilterns a landscape of national importance today will almost certainly persist.

9. The attractiveness of the Chilterns landscape, the proximity of London and several large towns and the high level of accessibility of the countryside have made the Chilterns one of the most visited areas in the UK, possibly Europe. And yet the intimate enclosed nature of much of the landscape and the large number of places with public access have spread the visitor pressure, enabling it to absorb that level of use without suffering from the problems of degradation and erosion that other well-visited landscapes commonly suffer from.
10. There is no single Landscape Character Assessment (LCA) for the Chilterns AONB. The whole of the AONB is covered by a number of county- and district-based LCAs which have been undertaken over a period of 15 years, using a similar specification, but not always identical.

Broad Aims

- Conserve and enhance the outstanding qualities of the Area of Outstanding Natural Beauty as part of the national landscape heritage.
- Maintain those features which make a significant contribution to the character and quality of the area and to regional and local distinctiveness.
- Enhance and restore those parts of the landscape which are degraded or in decline.
- Enhance the level of awareness of what makes the Chilterns landscape special and the desire to care for it.

Special Qualities

1. A dramatic chalk escarpment rising to nearly 900 feet (272 metres) with flower-rich downland and panoramic views. Once extensive, the downland survives in

- smaller fragments and now only covers 1% of the AONB, of which less than half is considered high quality calcareous grassland important for its biodiversity.
2. The main ridge of the escarpment provides fine long views across the lower lying vales to the north and west. To the south, views are more restricted by dense woodland and low-lying ridges.
3. The underlying chalk ridge is covered by several feet of clay with flints, but along the ridge the chalk lies near the surface and is peppered with quarries, small and large, now largely redundant.
4. The landscape of the Chilterns is given unity by its escarpment but there are notable local variations. The northern Chilterns are generally more open with larger fields and less woodland, also a characteristic of the southern tip in the area known as the Ipsden prairie. The central and southern Chilterns are dominated by heavily wooded countryside with mixed farming and a large number of scattered villages and hamlets. Along the southern boundary the hills come down to the Thames Valley and the River Thames itself which forms a long and sinuous boundary.
5. Woodlands, notably beech, cover over 18,000 hectares, nearly 22% of the AONB, making it one of the most wooded landscapes in England. Once the woods were home to bodgers and other woodland workers but today are mainly valued for their amenity, wildlife and as places to visit.
6. Farmland covers approximately 60% of the Chilterns³, creating a mosaic of fields with arable crops and livestock, bordered by ancient hedgerows and trees. A mix of crops, dairy cattle, sheep and pigs was once commonplace, but grazing of livestock is less prominent now and more land is given over to arable farming.
7. Chalk landscapes are dry landscapes, but in a few shallow valleys can be found gently-flowing streams, often bordered by pollarded willows and remnants of meadows and former watercress beds, once a common sight and thriving local industry.
8. The folds of the landscape hide many small dry valleys or coombs with no springs or streams. These places provide hidden 'secret' landscapes and unspoilt countryside.
9. Commons, heaths and greens are a defining characteristic of the Chilterns landscape covering 2.4% of the landscape (2,016 ha). However, they were once more extensive, and many have been lost to a combination of enclosure, urbanisation and woodland encroachment. Whilst open landscapes tend to be associated with common land, a significant number of Chiltern commons would originally have been woodland or wood pasture.
10. Over 191 areas of registered common land still provide special landscapes largely untouched by development and modern agriculture. Much of the common land in the Chilterns is in close proximity to towns and villages, providing valued, easily accessible green spaces for local communities. Nearly 10% of the remaining common land in the AONB is ancient woodland.
11. The Chilterns has an extensive network of ancient routes, roadside hedges and sunken lanes. The Ridgeway (Icknield Way), reputedly the oldest road in the country, is elevated along the entire length of the Chilterns, linking Wessex with East Anglia.
12. Villages and farmsteads with brick and flint cottages, churches and timber barns are scattered throughout the area. The more ancient settlements tend to nestle alongside streams and rivers or springs at the foot of the escarpment. More recent settlements sprung up on the higher ground, strung along the edge of commons and beside droving routes.
13. The area boasts a wealth of great houses, follies, parkland and designed

³ Chilterns Land Use Survey 2010, CCB

landscapes. Often built and embellished by statesmen and businessmen making their fortune in London, it is a trend which continues to this day. Foremost is the Prime Minister's rural retreat at Chequers near Wendover.

14. The Chilterns is a long settled landscape with relics of many different eras: Bronze Age barrows and fields, Iron Age hillforts, medieval deer enclosures, eighteenth century sawyer pits and chalk figures carved in unknown times.

Key Issues

There are many factors affecting the landscape and how it is managed. Often the causes of change are complex and the trends uncertain. The scale and variety of the Chilterns landscape means that trends and issues affect different parts in different ways. Perhaps as much as at any other time, global factors and trends are influencing the Chilterns as, for example, farmers respond to world prices for grain and landowners from overseas invest funds in newly acquired estates. Increasing numbers of pests and diseases, many new to the UK, are now posing a serious and long term threat to wildlife, farming and forestry.

Changes to farming

1. The growth of arable farming in response to the world price of cereals is likely to be a factor for several years as concerns about food security grow and demand increases from China, India and other countries. Traditional growers of grain may be affected increasingly by weather extremes and climate change and as prices rise above recent lows, farmers in the Chilterns will grow crops for which they anticipate a steady if not increasing market price. This is unlikely to lead to ploughing up of grassland important for its wildlife, as it once did, as these sites are largely protected, but it will change the landscape, as has been seen, for example, where short term grass leys have been converted to grow cereals

and oil seed rape. In general, it can be anticipated that many farmers will increase their area of actively farmed land and the relative attraction of agri-environment options will reduce.

2. At the time of writing the reform of the Common Agricultural Policy (CAP) is ongoing. Already announced by the UK Government is a new environmental land management scheme to come into effect in January 2015, which combines environmental and forestry grants. It will be targeted instead of being available universally. At the time of writing it is not known if all of the Chilterns AONB will be a target area.
3. The decline of livestock farming, of all types, is leading to problems for the management of sites which need grazing in order to retain their biodiversity and landscape qualities. There is little likelihood of a reversal of this trend as farmers give up livestock and increasingly choose to concentrate on growing cereals or leave farming altogether.
4. Although the number of full-time farmers is declining there are many more small agricultural holdings reflecting the relative popularity of hobby and part-time farming. In some places this is leading to a fragmentation of the landscape with smaller fields, new buildings and a greater diversity of activity in a smaller area. Inevitably not all of these new holdings are well managed and some detract from landscape quality.

Climate change

5. The changing climate with its extremes of weather may alter the landscape but predicting the nature of that shift is difficult. Examples of possible effects include a reduction in the extent of beech woodland, effects on the flows of chalk streams and the introduction of new crops in response to different growing conditions.
6. The increasing variability of the climate with the associated difficulties of predicting the weather from one season

to the next is affecting yields and, in most cases, profitability. Such uncertainty, together with the availability of grant support, will have an impact on related environmental management and the resources available for such activities.

7. The potential for scrub to spread across open grassland landscapes is increasing due to a combination of the problem of grazing sites and the potential for more rapid growth of scrub in those years when the weather is mild and growing season is longer.
8. For the foreseeable future the landscape will still be dominated by farming and forestry and the spatial pattern of land use is unlikely to alter directly as a consequence of climate change. It is more likely that, for example, the species composition of woodlands may change - the general appearance will be similar to the woodlands of today but will become more varied over time.

Attitude of owners

9. There is evidence of the amalgamation of farm units to create bigger businesses with an increasing use of contractors. One consequence is that those who make the main decisions have less time, and sometimes knowledge, of the environmental options available to them.
10. As new owners buy land they often place higher priority on leisure and amenity than production. This is partly behind the expansion of the area covered by pony paddocks, extension of gardens and newly landscaped grounds. Often it is accompanied by the spread of fencing, screening of all kinds and inappropriate clutter such as lights and temporary buildings.
11. The general growth of leisure uses, notably equestrian, has resulted in a significant number of horses, new pony paddocks and associated buildings and equipment. Also prominent in the landscape are new and expanded golf courses. Whilst they can provide high quality habitat this is dependent upon

extensive sympathetic management. Such land uses are often most prevalent on the outskirts of towns and villages, a perspective seen by large numbers of people for whom such a landscape may become the norm.

12. Many Chilterns commons are affected by the increasing demands for access and recreation and changing public attitudes, for example towards grazing livestock close to towns and villages.
13. A continuing and largely unnoticed trend has been the loss, usually partial, of unregistered parks and gardens, for example around large houses now used for institutions or businesses.

Decline of cherry orchards

14. The once large number of cherry orchards continues to decline to the point they are now a fast vanishing feature of the landscape. There is a growing interest in conserving and restoring some of the best examples to ensure this element of the traditional Chilterns rural scene is not lost and forgotten. Recently there has been a welcome small increase in the area of apple orchards.

Fragmentation of land ownership

15. The continuing fragmentation of the landscape by transfer to smaller holdings is affecting the scale and nature of management of land. Such fragmentation also highlights the nature of intervening land, for example between fragments of chalk grassland or ancient woodland. The links are important to allow wildlife to move around a larger network of suitable habitat.

Under-management of woodland

16. Many types of woodland, especially small woodlands, are under-managed, even neglected. The long term decline of timber prices, notably for beech, has depressed the market and is unlikely to change in the near future. However prices for fuel wood are increasing and helping

to stimulate management of woodland. A decline of skills and the availability of skilled contractors with the necessary machinery and transport is a concern, as is the loss of knowledge and experience of timber production.

Pests and diseases

17. The impact of pests and disease on trees, woodlands and forestry will be profound. The recent spread of ash dieback (*Chalara fraxinea*) may have severe and widespread impacts. It is likely that many, but not all, of the several million ash trees in the Chilterns will be affected in the next 20 years. It should not lead to the loss of woodland cover if other species naturally regenerate or are planted, however a very severe loss will be the larger mature ash trees in hedgerows and along most roads. Its likely impact is still uncertain and whilst many trees may die others may survive. A positive programme of replacing those lost trees will be needed otherwise the landscape, particularly farmland, will be bereft of mature trees for many years. Acute Oak Decline, Oak Processionary Moth and *Phytophthora* are also of particular concern for Chiltern woodlands. It is essential that a considered approach, based on the best available scientific advice, is taken and quick responses are avoided.
18. The widespread damage caused by excessive numbers of grey squirrels, deer (muntjac, fallow and increasingly roe) together with localised problems caused by the edible dormouse (*Glis glis*) continues to hamper efforts to establish and grow trees, especially for timber.

Removal of conifers

19. Government policy to remove plantations, especially of conifers, from ancient and semi-natural woods (PAWS) will help restore their natural qualities. Where existing conifers are important for their amenity, for example by providing winter greenery, a careful and phased removal is advocated.

Ageing beech woodlands

20. The changes to the many mature beech woods may result in long term changes in the woodland landscape. They will be barely discernible in the short term, but already ash, which regenerated in the gaps left by beech trees blown down in the early 1990s, has changed the landscape by altering the colours and timing of flushing and leaf-fall.
21. It is likely that beech will persist in smaller pockets even through significant changes in climate, but it will no longer be as dominant. The balance of woodland cover needs to slowly change to reflect the tolerance of species to more extreme weather. If the Chilterns is to be a timber-producing area in the long term unfamiliar species may have to be introduced.

Renewable energy

22. Although it cannot be ruled out, it is unlikely there will be many applications to erect wind turbines in the AONB due to low wind speeds generally and the unacceptability of siting them along the skyline where wind speeds are higher. There may be places where relatively small turbines could be accommodated without unacceptable intrusion in the landscape.
23. With growing pressure to increase generation of renewable energy there are likely to be more proposals for solar farms, anaerobic digesters and wood-fired systems. Providing they are on an appropriate scale in non-sensitive locations it is possible these forms of energy generation can be accommodated in the Chilterns landscape, but these are important caveats.

Setting of the AONB

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

Development pressure

25. Large numbers of new houses are planned in surrounding towns and construction will affect the land adjacent to, and visible from, the Chilterns. Land scheduled for development may be less well managed, even abandoned in anticipation of new development in the relatively near future. Once created there may be a harder, more defined edge between town and country. The view from the ridge of the escarpment will be significantly affected in some places, although green infrastructure provision is an intrinsic part of the growth area strategies. The provision and long term management of green infrastructure should be an integral component of planning any new development, both enhancing the new development itself and the way it is integrated with the surrounding area.
26. A more immediate, but less obvious change in the landscape is the impact of building new houses on infill sites and gardens in villages. Usually the resulting houses have small gardens and there is less scope for trees to grow to maturity and provide highly value amenity and screening. In some cases the infilling itself and unsympathetic design of the new development changes the character of the settlement.
27. As the Chilterns landscape is a mosaic of the natural and built environment it is important that the design of new buildings complements the existing character of the landscape and settlement, especially where it is based on vernacular architecture. New designs must also exhibit the highest environmental standards in terms of energy and water conservation.

Landscape clutter

28. There is a tendency for clutter of all types (e.g. signs, masts, barriers and fences) to accumulate along roadsides, around settlements and along the skyline. It is an insidious problem which is difficult but not impossible to reverse. The co-operation of the highways authorities is essential as they are often responsible for much of the clutter.

Loss of tranquillity

29. According to national surveys, half of all visitors to the countryside say that peace and quiet is a primary reason for their visit. The enjoyment of the landscape is being increasingly eroded by a loss of tranquillity - peace and quiet is harder to find largely due to traffic noise, notably the M40 and several of the trunk roads, and the increase in over-flying by aircraft of all types using Luton, Heathrow and local airfields. The loss will intensify if the proposal by Luton airport to double its capacity goes ahead. The expansion of Heathrow would also mean more over-flying aircraft at low altitudes.
30. The darkness of the night sky and the absence of visual intrusiveness of structures and buildings all add to a sense of tranquillity; these are attributes which are over-looked and are being continuously and insidiously lost. If High Speed 2 is built the corridor through which it passes will lose most of its remaining tranquillity in all senses - it would be largely protected if the railway is in a continuous bored tunnel.

High Speed Two

31. The impact of High Speed 2 on the Misbourne Valley will be severe and permanent. At the time of writing the impact of the current design with a long section on the surface crossing two viaducts cannot be adequately mitigated. The proposal to provide screening by using spoil from the cuttings to create line-side embankments is not an appropriate design solution in an AONB. The loss of ancient woodland

cannot be replaced by the proposed tree planting, much of which will be planted on farmland which should be kept in agricultural use.

32. The Conservation Board opposes High Speed 2 because it is not convinced that an adequate case has been made that it is in the national interest. The Board also believes that it is possible to avoid the AONB with changes to the design specification, notably the line speed. The Board believes that if the railway is finally given the go ahead by Parliament, it should be in a full length bored tunnel as it passes through the Chilterns.

Policies

L1 The overall identity and character of the Chilterns should be recognised and managed positively.

The main characteristics of the Chilterns landscape have been created by human intervention. In most cases they need to be managed actively in order to retain those qualities or restore natural characteristics which are in decline e.g. chalk downland, hedgerows, ancient woodlands, chalk streams, traditional cherry and apple orchards.

L2 There should be greater understanding and awareness of local landscape character which contributes to local distinctiveness.

The main landscape types such as woodland, farmland, river valleys and downland are large in scale, but are owned by large numbers of individuals, who often own small plots. The challenge is to help all owners and managers to be aware of the character of the wider landscape and the context for their own activities. It also highlights the importance of managing boundary features well and where possible, ensuring there are no intrusive boundaries such as close board fencing in open countryside. This policy aims to help current stewards of the land to

ensure that future generations benefit from an equally high quality landscape.

L3 Local pride in the landscape and special sense of place should be encouraged to promote concern for their conservation.

The Chilterns is fortunate in that so many people and organisations are concerned about its environmental quality. The Chiltern Society alone has over 6,500 members and the Wildlife Trusts, National Trust and RSPB amongst others are well supported. Together with local authorities, including 117 town and parish councils and voluntary and community groups, there are many organisations with powers, resources and a willingness to work to conserve what is special about the Chilterns and to act as stewards of the landscape. These organisations and individuals all need support to maintain their active roles.

L4 The distinctive character of buildings, rural settlements and their landscape setting should be conserved and enhanced.

A primary characteristic of the Chilterns landscape is the large number of attractive towns and villages, buildings, farms, barns and churches. It is the combination of their charm and setting in the landscape that contributes so much to the special qualities of the Chilterns and reinforces what is distinctive about the area.

L5 Developments which detract from the Chilterns' special character should be resisted.

There are significant pressures to change the use of land, erect new buildings and structures, improve transport infrastructure or expand economic and leisure activities. They can often be satisfactorily accommodated without detriment to the landscape, but not always. The town and country planning system and other regulatory and advisory processes need to be in place and applied to ensure that damaging changes are prevented. A great deal of

information and advice is available to help ensure proposed changes are in keeping with the special character of the AONB and its setting.

L6 Degraded aspects of the landscape should be enhanced including the removal or mitigation of intrusive development and features

In some senses the Chilterns is a busy landscape with a large number of buildings, structures and, what some might call, clutter. Such clutter comes in many forms and can include: masts, signs, fences, utilities infrastructure and highways structures. It tends to accumulate rather than be removed even after its useful life has ended. Sometimes concerted effort is needed to bring about its removal by planning conditions, regulations, advice, practical assistance or incentives. There is also scope to mitigate, or even screen, less attractive structures and features where they are still in active use or are unlikely to be removed.

Similarly what was once regarded as an acceptable design is now considered out of place. The utilitarian and universal designs used by national utility companies is a good example of when a more sensitive and tailored approach would have been more appropriate for an AONB.

Some developments have been constructed which, over time, now look out of place by virtue of their location, scale or design. Whilst removal remains unlikely or impossible greater consideration should be given to mitigation to diminish those negative impacts.

L7 The quality of the setting of the AONB should be conserved by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns.

The Chilterns is surrounded by many market towns and the larger settlements of Reading, Hemel Hempstead, High

Wycombe, Luton, Dunstable and Aylesbury where large numbers of new houses and other developments will be built during the next 20 years. The design and location of these buildings need to be sensitive to the AONB, for example by not having excessively high or reflective roofs. The impact of development adjacent to the AONB will be significant in many ways including its visibility from many popular sites. It is important that appropriate landscape and visual assessments are undertaken.

L8 Landscapes close to existing and new areas of development should be maintained and enhanced to conserve, enhance and extend: natural capital; green infrastructure; character and amenity; biodiversity; and opportunities for recreation.

The boundary of the AONB is long and sinuous, curling around many towns and villages. The interface between the AONB and these communities is important and the quality of landscape in this belt is often under pressure. Such problems may be compounded where new development is planned, resulting in less intensive management and additional pressures placed by new residents seeking to use adjacent countryside for leisure and recreation. These places create what is being called green infrastructure and need to be identified in advance and appropriate management and investment put in place. The countryside close to home is often the most important, which means creating green spaces within the development zones as well as adjacent to it. It is essential there is no reliance on sensitive sites, for example along the scarp ridge, to provide green space in lieu of sites closer to new development.

L9 Multiple ecosystem services should be provided through landscape-scale activity.

In a small country it is essential that land provides as many benefits as possible. In the Chilterns this means ensuring that in addition to any productive capacity land may have it is part of a high quality landscape, supports biodiversity, locks up carbon, helps ensure clean supplies of water as well as providing places for leisure and recreation. This may seem very demanding but much of the Chilterns is capable of providing such multiple benefits. This has long been the case but as demands on a limited area of land continue to grow such multiple benefits (ecosystem services) need to be generated and may be a requirement in return for public funding.

L10 The cumulative impact of development and land use change should not adversely affect landscape quality and character.

Often approval for new development is given on its own merits and the cumulative impact it represents is given a much lower level of consideration. The effect over time can be negative by creating a more crowded landscape with an array of associated, often unplanned or even unforeseen, features and structures.

Some forms of development, in particular housing, can have an impact on the use of surrounding land, for example, making it harder to farm or manage woodland because of the public pressure. This effect is particularly prevalent in the urban fringe where valued rural character can quickly be lost.

L11 The design and management of transport infrastructure and services should reduce their harmful impacts, including greenhouse gases, and not damage the natural beauty of the Chilterns.

Transport infrastructure has a major impact on the landscape of the Chilterns. Over 300 roads cross the AONB boundary and four railways including the west coast mainline. Many of the roads are ancient in origin and are part of the environmental and cultural heritage. Many roadsides are rich in wildlife and sunken lanes and milestones add to the landscape. In recent years the design and management of roads and other transport infrastructure has been unsympathetic to the environment which has changed the landscape. Inevitably the use of this infrastructure is a major source of greenhouse gas emissions and speeding traffic in villages and in open countryside adds to the negative impacts.

L12 The construction of High Speed 2, as proposed in April 2014, is opposed because of the likely negative impacts on the special qualities and character of the AONB.

a) Should HS2 be constructed it should be in a full-length bored tunnel under the AONB in order to minimise the impacts.

b) Should HS2 not be constructed in a full length bored tunnel, then the negative impacts of the design should be mitigated to reflect fully the Chilterns' status as an AONB – a nationally protected landscape.

The advice by the Conservation Board to Government has been that High Speed 2 will have a severe and permanently negative impact on the special qualities of the Chilterns Area of Outstanding Natural Beauty; and its enjoyment by both local people and visitors. Whilst it is understood that national infrastructure has to be built in the national interest, the case for HS2 is not compelling and less damaging alternatives are available.

At the time of writing (March 2014) the Second Reading of the High Speed 2 Bill has not taken place by Parliament. If it is Parliament's decision that HS2 should be built, the best way of protecting

the AONB is for the railway to be in a bored tunnel for its full length under the Chilterns. In particular the current proposal to deposit up to 12 million tonnes of spoil in the AONB on farmland is wholly unacceptable.

Whilst it is known that a full length bored tunnel (possibly with an intervention gap) is technically feasible and desired by local people, it is possible that the Government will decide to retain the, largely, surface route through the Chilterns in order to reduce the cost to itself. In which case, every effort should be made to avoid and mitigate the negative impacts. This has to be done in such a way that the mitigation itself does not create unacceptable negative environmental impacts. This is desirable both for the conservation of the special qualities of the Chilterns AONB, and to demonstrate that significant weight is given by the Government to the protection of nationally-designated landscapes with their heritage assets, ancient woodland and other sites and features of importance.

L13 The management of the landscape to enable it to adapt to climate change and to help mitigate the causes should be promoted.

The landscape of the Chilterns is dynamic and one of the factors causing this is the changing climate. For example, the low flows in chalk streams were, until recently, due to prolonged periods of winter drought. The relative strength of climate change as a driver of change is likely to increase and be persistent over a long time. It is unlikely there will be rapid changes in the landscape and some changes are barely discernible.

However more extreme weather events will become more commonplace requiring short term changes in management of the landscape, for example by coping with frequent heavy downpours and minimising run off. Longer term changes may affect the ability of beech to survive on many sites



A farmland landscape in the Stonor Valley

where it is now found. Foresters will need to consider how to manage woods to make them more resilient to climate change. For example, by making stands of trees less prone to wind throw, or planning for a modification of species composition to those more tolerant of predicted climate changes – for example it is suggested that walnut might fare better as a timber tree than beech. In general, natural regeneration is to be encouraged as these systems cope best with climate change. These adaptations will also help build resilience to the threat from pests and diseases.

To halt the damaging effects of climate change it is essential that long term measures are put in place. For example, ensuring that carbon dioxide is fixed in soils by maintaining and enhancing the organic matter content. Other measures may include the use of trees to provide shade to reduce the need for air conditioning of buildings. Farming systems which minimise the loss of water from soil will be encouraged.

L14 Tranquillity should be conserved and restored when all development and major landscape management is planned.

Everyone values peace and quiet and attractive, unspoilt scenery. These are the key characteristics of tranquillity, a quality which is much valued but being constantly lost. Experience shows that once lost it is very difficult to restore, thus the need to prize it highly and conserve it whenever possible. The noise pollution and visual intrusion that will be created, for example, by High Speed 2 will significantly diminish any sense of tranquillity currently enjoyed by residents and visitors along that part of the Misbourne Valley through which the line will pass.

L15 The understanding and importance of how geology and soils contribute to the special character of the Chilterns should be enhanced.

The long term care and stewardship of the AONB depends upon a deep understanding of what makes it special. An understanding of how the geology of the Chilterns and associated soils form both the topography of the Chiltern Hills and sustain the various land uses, even buildings, which make it so special is essential. In practice knowledge of the geology and soils of the area is extremely limited.

L16 Sites of geological importance should be conserved and actively managed.

Because chalk is a soft rock it is almost never visible at the surface through outcrops and cliffs. Instead it erodes easily and is quickly covered by vegetation. This, in part, explains why there is so little general appreciation of the geology of the Chilterns. And yet there are a small number of sites (Regionally Important Geological Sites – RIGS) where it is possible to appreciate and learn about the special geology of the area. Most are man-made - cliffs

created by quarrying which has exposed the various layers of chalk laid down in the Cretaceous Period (65- 100 millions years ago).

L17 All land management should conserve soil quality.

It is important for many reasons to maintain and enhance soil quality. It is a very large store of carbon and water. If its organic content is reduced it stores less of both. Inevitably that also reduces its productive potential for farming. Where the soil structure and fertility has been diminished farming yields can only be maintained by adding fertilisers and other inputs, which is less sustainable, more expensive and often results in environmental problems such as run off - much of which ends up in rivers and the aquifer where it can affect drinking water supplies.

L18 The impacts of pests and diseases (notably grey squirrels, deer and ash dieback) on the landscape should be prevented, minimised and mitigated.

The impact of pests and diseases will be severe and unless there is more concerted effort to prevent specific species from assuming pest status, it will be more difficult to maintain landscape quality, conserve wildlife and maintain the productive potential of woodland and farmland. Prevention is by far the best strategy and it will require new ways of managing land. For example, the age and species diversity of woodlands will have to change, possibly with more use of non-native species (in accordance with Forestry Commission advice), otherwise the ongoing ravages of pests and diseases will increase.

Farming, forestry and other land management

Introduction



Barley in the Radnage Valley

Farming and forestry have shaped the Chilterns landscape but it is important to recognise that many other forms of rural land use now exist. The wide range of diverse uses includes golf courses, private parkland and nature reserves. This chapter describes issues common to all and encourages positive engagement with farmers, woodland owners, other land owners and advisers alike.

Farming

1. Farmland covers approximately 60% of the Chilterns¹, creating a mosaic of landscape and habitats: small and large fields, ancient hedgerows, woodland, chalk downland and ponds. This figure does not include land used for equines, which makes up approximately 5% of the AONB land area. Farming also created the farmhouses and barns which dot the landscape, often form the heart

¹ Chilterns Land Use Survey 2010

of villages and hamlets and make a significant contribution to landscape character.

2. Since the advent of farming in Neolithic times, the Chilterns landscape has been incrementally altered and moulded. Each period in history has contributed to the piecemeal enclosure of the land for cultivation and livestock management. Examples of periods of agricultural change, the remnants of which can still be seen in the landscape, include the creation of coaxial fields in the Bronze Age, the clearance of woodland for open fields from the Middle Ages and the creation of parliamentary enclosure fields in the 19th century. The cumulative result is the familiar landscape we see today - a diverse patchwork of different shaped fields of arable crops and grassland, enclosed by hedgerows interspersed with woodland, common land and downland.

Appendix 3 Appeal Decision Ref 3160901

Appeal Decision

Site visit made on 28 February 2017

by **Stephen Hawkins MA MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 29 March 2017

Appeal Ref: APP/X0415/W/16/3160901

Homestead, Burtons Lane, Little Chalfont HP8 4BL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Smyth of Homestead Rel Ltd against the decision of Chiltern District Council.
 - The application Ref CH/2016/1517/FA, dated 12 August 2016, was refused by notice dated 12 October 2016.
 - The development proposed is demolition of existing agricultural units and construction of three detached dwellings.
-

Decision

1. The appeal is dismissed.

Main Issues

2. The appeal site is in the Metropolitan Green Belt. The main parties have agreed that the proposal would represent inappropriate development in the Green Belt as defined in saved Policy GB2 of the adopted Chiltern Local Plan 1997 (LP) and paragraph 89 of the National Planning Policy Framework (the Framework). I share that conclusion. Therefore, the main issues in this appeal are:
 - The effect of the proposal on the openness and purposes of the Green Belt.
 - The effect on the character and appearance of the area.
 - Whether the harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations. If so, whether this would amount to the very special circumstances required to justify the proposal.

Reasons

3. The appeal site mainly consists of a group of former agricultural buildings and a tennis court, occupying a broadly rectangular area of land adjacent to a substantial detached dwelling, 'Homestead'. Two of the buildings have recently received prior approval from the Council for their change of use to single dwellings¹. However, during my site visit I observed that neither change of use had taken place. Vehicular access is obtained from Burtons Lane via a long private drive shared with the existing dwelling. To the north are the back

¹ References CH/2016/0843/PNAD & CH/2016/0845/PNAD.

gardens of the detached residential properties fronting Loudhams Wood Lane, with open fields to the south and east.

Green Belt openness and purposes

4. The proposed dwellings would be arranged in a row, occupying part of the area of the existing buildings and the adjacent hardsurfaced yard. According to the details supplied, the cumulative footprint of the proposed dwellings would be about a third smaller than that of the existing buildings.
5. Paragraph 79 of the Framework advises that openness is an essential characteristic of the Green Belt. Openness is accepted as meaning an absence of buildings or development. I have been referred to a passage in a recent decision of the Court of Appeal² to support the appellant's position that the proposed dwellings would increase the openness of the Green Belt. However, in a more recent case³, the same Court has confirmed that the concept of openness includes a visual as well as a spatial element. I have also been referred to an appeal decision where openness was considered separately from matters of visual impact⁴. Even so, that decision pre-dates the recent case law. It therefore follows the footprint of built form alone is not the determining factor in the consideration of the effects of a development on openness; the size, height and overall bulk of the proposed dwellings are also relevant factors.
6. On account of the proposed dwellings being of a height similar to nearby dwellings, they would be around double the height of the existing buildings. The proposed dwellings would also have a much greater volume than the existing structures. As a result, they would have substantially increased size, height and overall bulk in comparison with the existing buildings. Although the spread of built form would be reduced in comparison with the existing buildings, the close grouping of the proposed dwellings would emphasise their cumulative size and bulk. This would be apparent at points along Burton Lane and from nearby residential gardens. The gardens of the proposed dwellings would incorporate land to the south of the tennis court, resulting in new boundary enclosures on land that is currently largely open. Consequently, the proposed dwellings would result in a reduction of the openness of the Green Belt.
7. Accordingly, I find that the proposal would significantly erode and thereby substantially harm, the openness of the Green Belt. The proposal would therefore represent an encroachment into the countryside, conflicting with one of the five purposes of Green Belts listed at paragraph 80 of the Framework. In accordance with paragraph 88, substantial weight must be afforded to the harm to the Green Belt.

Character and appearance

8. The existing buildings on the appeal site have a simple, functional appearance typical of many agricultural buildings and they mostly have a low profile. They are situated in an area that could aptly be described as having a semi-rural character and appearance. This is due to the location beyond the more built-up part of Little Chalfont, adjacent to open fields. Consequently, the existing

² R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404.

³ John Turner v SSCLG and East Dorset Council [2016] EWCA Civ 466.

⁴ Ref: APP/Y3615/A/12/2168295

buildings are accepted features in their surroundings and visually, the appeal site relates more readily to the adjacent fields as opposed to the nearby housing.

9. The proposed dwellings would reflect the design and scale of nearby residential properties and they would have a similar plot size. However, due to their substantial overall size, height and bulk as well as their closely arranged siting, the proposed dwellings would have an assertive, more built-up and obviously residential appearance in their surroundings. This would be entirely at odds with the more rural characteristics of the appeal site and the adjacent fields. The existing planting on the northern boundary of the appeal site and elsewhere in the vicinity would not significantly offset the adverse visual effects identified above.
10. Consequently, the proposed dwellings would appear as harsh and alien features in their surroundings, particularly in views from Burtons Lane and from nearby residential gardens and they would be seen as an obvious, residential intrusion into the otherwise mainly rural surroundings. As a result, the proposed dwellings would have an unacceptable adverse effect on the character and appearance of the area. The visual impact of the proposed dwellings would be substantially greater than that which would arise from implementing the prior approvals, as there are unlikely to be significant changes to the external appearance of the existing buildings or the land within their curtilages.
11. As a result, the proposal would not accord with saved LP Policy GC1, as it would not be in scale with the surroundings, it would not relate well in terms of overall dimensions to the landscape features which form the setting of the appeal site and it would not relate well to the characteristics of the appeal site.
12. The proposal would also not accord with Policy CS20 of the adopted Core Strategy for Chiltern District (CS) as it would not achieve a high standard of design, reflecting and respecting the character of the surrounding area and those features which contribute to local distinctiveness. The failure to promote or reinforce local distinctiveness would also be inconsistent with paragraph 60 of the Framework and would not adequately reflect the importance placed on good design as a key aspect of sustainable development at paragraph 56.

Other considerations

13. No evidence has been presented to dispute the appellant's claim that the Council does not have a 5-year supply of housing land. Therefore, in accordance with paragraph 49 of the Framework I have to regard the Council's policies for the supply of housing land as not being up-to-date. In accordance with case law⁵, this would include Policy GB2. However, as the appeal site is in a Green Belt, in accordance with paragraph 14 and footnote 9 there are specific policies in the Framework which indicate that development should be restricted. Moreover, the Planning Practice Guidance⁶ advises that unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the very special circumstances justifying inappropriate development within the Green Belt.

⁵ Suffolk Coastal District Council v Hopkins Homes Ltd; Richborough Estates Partnership LLP v Cheshire East, SSCLG [2016] EWCA Civ 168.

⁶ Housing and economic land availability assessment Paragraph: 034 Reference ID: 3-034-20141006.

14. When assessed against the objectives of sustainable development, the proposal would have to achieve the three mutually dependent roles at paragraph 7 of the Framework- economic, social and environmental. The proposed dwellings would be on a 'windfall' site, boosting the supply of new housing in accordance with paragraph 47 of the Framework in a location which is accessible to local facilities, services and public transport links by means other than the private car. Given that there is a shortfall in housing land supply, this benefit has to be afforded some weight. However, the benefit would be modest. It would also only be slightly greater than that arising from the two dwellings granted under prior approval; this has the effect of limiting the scale of the benefit.
15. In addition to the modest social benefit identified above, the proposal would provide a small economic benefit, notably in terms of short-term employment in the construction sector during the building phase. However in this instance also, the benefit would only be marginally greater than that which would arise from implementing the prior approvals. There would be adverse social and environmental impacts arising from the proposal as a result of the failure to create a high quality built environment and the failure to contribute to protecting and enhancing the natural and built environment. As the proposal would not achieve the social and environmental roles, it would not be sustainable development as meant by the Framework.
16. I have been referred to the 'Green Belt Preferred Options Consultation' document published by the Council last year in connection with its preparation of a new joint Local Plan with a neighbouring authority. In the document, the appeal site forms part of a larger area of land south east of Little Chalfont that the Council proposes to remove from the Green Belt. However, the new Local Plan is at a very early stage in its preparation. At paragraph 79, the Framework advises that an essential characteristic of Green Belts is their permanence. Consequently, in accordance with the advice in paragraph 216, I have given this document weight.
17. I accept there is a realistic prospect that the prior approvals will be implemented, resulting in two new dwellings within two of the existing buildings together with their associated residential curtilages. However, for the reasons set out above the effects of the prior approvals would be significantly less harmful than the appeal scheme. Therefore, the prior approvals do not represent a 'fallback' position that might otherwise justify the proposal. Nor can they establish the principle of further residential development at the appeal site.
18. I have also been referred to two appeal decisions concerning a residential development for 56 dwellings⁷ and 110 dwellings⁸ in areas administered by nearby Councils, where the absence of a 5-year supply of housing land weighed in favour of granting permission. However, neither of those sites were in a Green Belt and due to their scale, the benefits offered by those schemes in terms of boosting housing supply were substantial. Consequently, neither of the decisions referred to are directly comparable with the appeal scheme.
19. The proposal would not cause unacceptable harm to the living conditions of the occupiers of adjoining residential properties or highway safety conditions. These are neutral factors which neither weigh in favour or against the proposal.

⁷ Ref: APP/J1915/A/14/2224660.

⁸ Ref: APP/Q31115/A/14/2217931.

20. I have also taken the representations made by interested local residents, the Parish Council and the Chiltern Society into account. In addition to the main issues, the matters raised include alleged increases in noise, air and light pollution, noise and disturbance during the construction phase, harm to local wildlife and a lack of capacity in infrastructure and local medical services. However, as I do not have any firm evidence before me in relation to any of these matters, I have afforded them little weight.

Planning Balance

21. Whilst there may be an undersupply of housing land, the proposal would make a very modest net contribution to boosting that supply. The other benefits arising from the proposal are limited. Therefore, the other considerations would not clearly outweigh the totality of the harm to the Green Belt. There would also be harm to the character and appearance of the area. Accordingly, the very special circumstances necessary to justify the proposal do not exist. Therefore, the proposal would be inconsistent with the Framework and it would not accord with the Development Plan.

Conclusion

22. The proposal would be inconsistent with the Framework, it would not accord with Development Plan and for the reasons given above I conclude that the appeal should be dismissed.

Stephen Hawkins

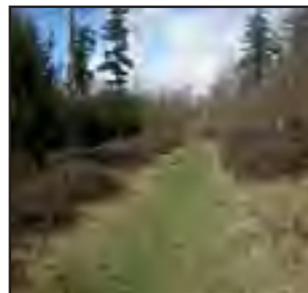
INSPECTOR

Appendix 4 Extracts from Chilterns Landscape Character Assessment, 2011

Chiltern District Landscape Character Assessment

Prepared for Buckinghamshire County Council
and Chiltern District Council

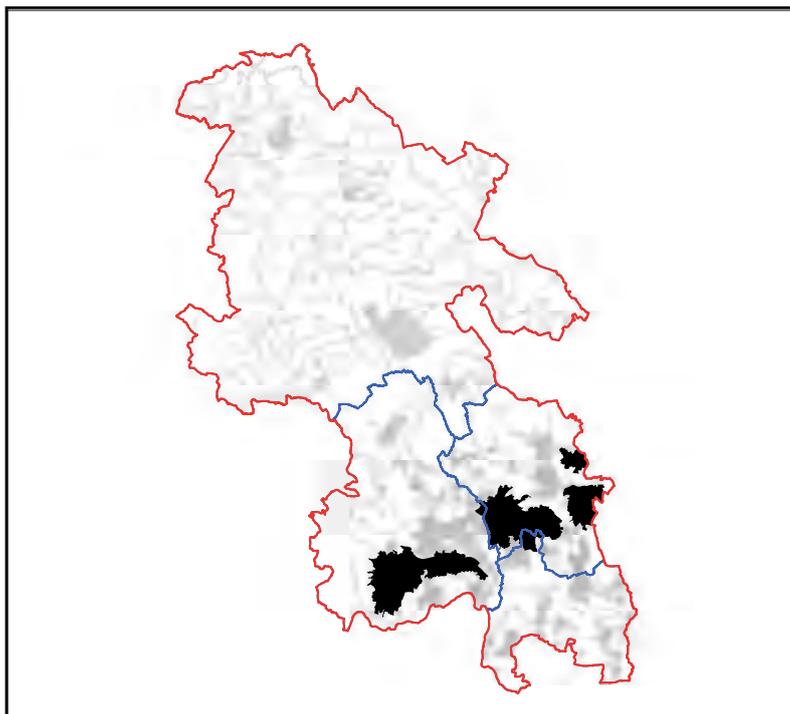
by
Land Use Consultants
October 2011



LCT 18 ROLLING FARMLAND

Constituent LCAs

LCA 18.1	Great Marlow
LCA 18.2	Penn
LCA 18.3	Little Chalfont
LCA 18.4	Codmore

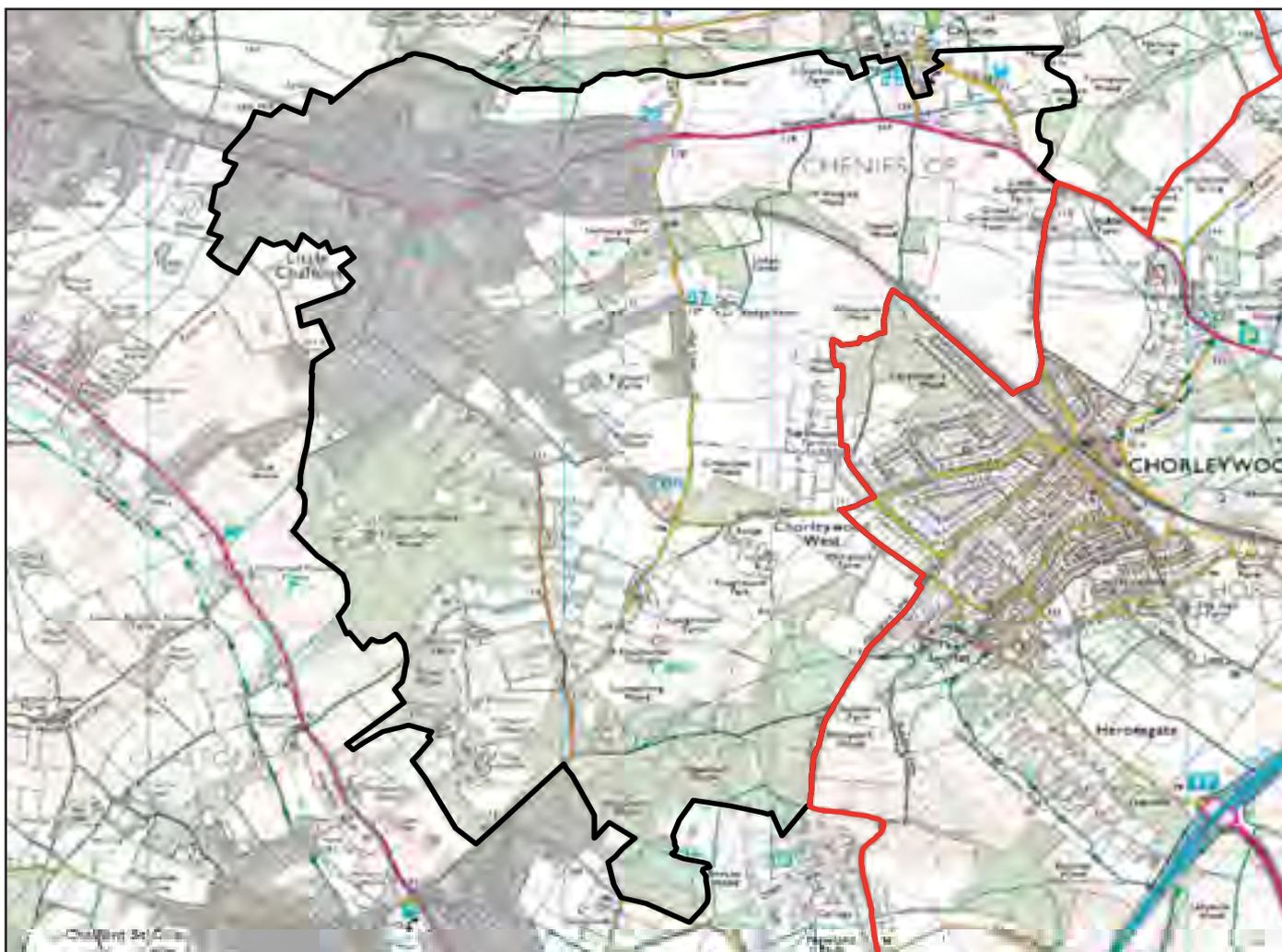
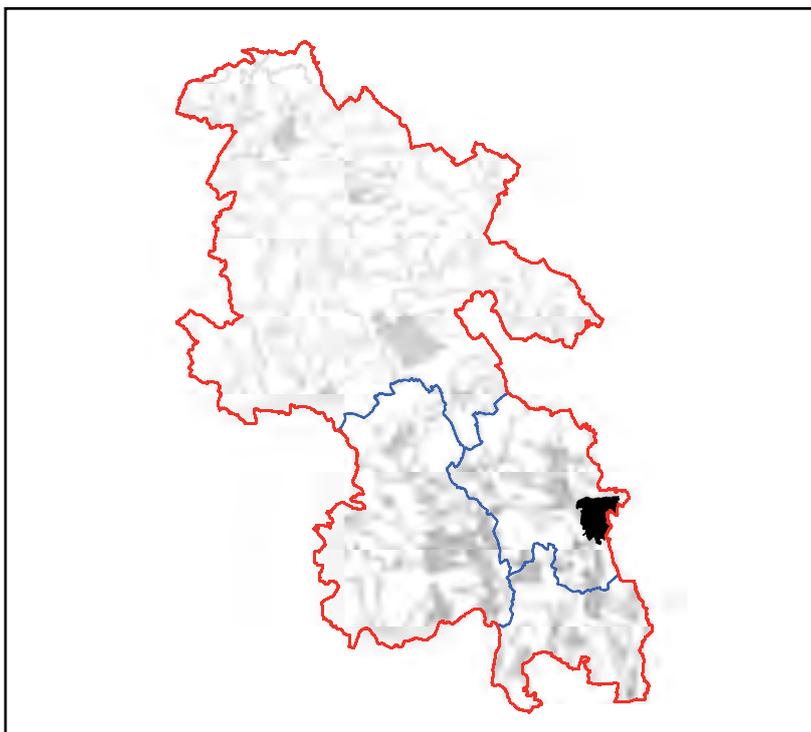


LCT 18 ROLLING FARMLAND

KEY CHARACTERISTICS

- Large scale landscape with rolling topography informed by a varied geology, including chalk and clay with flints, and River Terrace Deposits.
- Predominately arable fields delineated by an intact network of hedgerows. Smaller fields of rough grazing, pasture and paddock are interspersed with areas of woodland.
- Often a dense and mature woodland character with large blocks broadleaved, mixed and coniferous woodland, and including ancient woodland.
- Typically low density, dispersed settlement comprising small hamlets/villages and individual farmsteads. Distinctive materials including, red brick, brick and flint, and black washed wooden cladding.
- Varying levels of enclosure, with open fields contrasting with dense woodland cover. Woodland often forms the backdrop to many vistas. Some long views across open farmland.
- Small winding rural roads and lanes with little traffic and an intimate character. A small number of footpaths, offering recreational access to woodland
- Sweeping topography and farmland land cover with limited settlement contributes to a well balanced and uniform landscape.
- Overall a remote and tranquil character prevails, with a strong sense of rural identity.

LCA 18.3 LITTLE CHALFONT ROLLING FARMLAND



LCA 18.3 LITTLE CHALFONT ROLLING FARMLAND

KEY CHARACTERISTICS

- 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.
- Arable farmland often occupies large extended fields with extensive boundary loss. Elsewhere, 20th century and pre 18th century irregular enclosures exist.
- Parkland 'hidden' in the south of the area, including Roughwood Park (late 19th century manor and park) and The Vache.
- 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 Shortenill'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.

LCA 18.3 LITTLE CHALFONT ROLLING FARMLAND

DESCRIPTION

Location and Boundaries: *Little Chalfont Rolling Farmland* lies wholly within Chiltern District, on its western edge. It occupies the higher ground between the Chess Valley to the north and Misbourne Valley to the south. The lower landform and lack of settlement distinguishes this landscape from the settled plateau to the north.

Landscape Character: An undulating and rolling landscape with a varied geology of exposed Upper Chalk, Clay and Flints capping and Thames River Terrace deposits. Large fields of arable farmland and rough grazing occur in the north of the area with smaller fields of paddock, pasture and rough grassland in the south. Field boundaries are predominantly hedgerows with some post and wire. Woodland is interspersed throughout with some large blocks of ancient woodland in the south and east (Pollards Wood and Newland Gorse). Woodland contains the area, provides enclosure, biodiversity value and a backdrop to views. The suburban edge of Little Chalfont filters into the landscape integrated by tree cover and the busy A40 Amersham Road cuts across the north of the area. Arable farmland and rough grassland in the north occupy large extended fields with extensive boundary loss while fields of pre 18th century irregular enclosures exist in relation to small fields of pasture grassland. Areas of parkland occur at Roughwood Park (dating from the 13th century) and The Vache. Away from the busy A404 and suburban edges of Little Chalfont the landscape retains a rural and peaceful character.

Geology: A varied geology, predominantly Clay with Flints capping the underlying chalk with exposed Upper Chalk and River Terrace deposits across the eastern edge. This change in geology is reflected in a change in soils with slightly acid loamy and clayey soils with impeded drainage and freely draining slightly acid loamy soils in the east.

Topography/Landform: An undulating and rolling landscape. Highest ground is in the west at Pollard's Wood where landform rises to 140m AOD with incised valleys in the east creating gentle slopes and undulations.

Hydrology: There are no discernable watercourses however there are occasional ponds within the area associated with farms or occurring in woods.

Land Use and Settlement: Some large fields of arable farmland and rough grassland in the north of the area delineated by network of dense hedgerows and some post and wire fencing. Smaller fields of paddock, pasture and rough grazing more typical of the rest of the area. Farmland is interspersed with broadleaved, mixed, and yew woodland, mixed woodland with a large area of coniferous woodland at Pollards Wood. The suburban edge of Little Chalfont filters into the landscape along roads with managed grass verges. Properties set back from the road within large gardens are scattered along

LCA 18.3 LITTLE CHALFONT ROLLING FARMLAND

the B4442. Tree and woodland cover integrate built edges into the wider landscape. Elsewhere dispersed individual properties and farms occur. Stretches of rural roads/lanes do occur through open farmland or enclosed by woodland.

A golf course lies on the eastern edge of Little Chalfont. The busy A404 Amersham Road, connecting Rickmansworth to Little Chalfont, and a railway line, crossing Lodge Lane on a bridge, cut across the north of the area. Pylons cross farmland and woodland in the south.

There are 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, continuing down to Chenies and the Chess Valley.

Tree Cover: Woodland is interspersed with farmland throughout the area with some large areas of ancient semi natural and replanted woodland occurring in the south and east of the area at Pollards Wood and Newland Gorse. Smaller areas of ancient woodland occur at Cross Lane Wood, Lodge Copse and Old Hanging Wood which is a linear strip of 'hanging' woodland. Woodland is broadleaved, mixed and yew with a concentration of coniferous plantation at Pollards Wood. Woodland often forms a backdrop to views across farmland. Hedgerow trees and some scattered trees in field contribute to tree cover in the area.

Perceptual/ Experiential Landscape: Varying levels of enclosure, with views often confined by woodland. Some long views across open sweeping farmland in the north, often to a distant wooded backdrop (including woodland along the valley tops of the Chess Valley). Woodland cover provides greater enclosure in the south of the area. The landscape is relatively contained by settlement edges and woodland with few views out to or in from adjacent landscapes. Away from the busy A404 and suburban edges of Little Chalfont the landscape retains a rural and peaceful character.

Biodiversity: Woodland provides a valuable habitat throughout this area connecting to hedgerows to provide wildlife corridors. Philipshill wood is a Local Wildlife Site. There are no priority BAP habitats in this landscape.

Historic Environment: Arable farmland and rough grassland in the north occupy large extended fields with extensive boundary loss. 20th century enclosure corresponds to the properties set in large gardens along the B4442. Small fields of pre 18th century irregular enclosures exist in relation to small fields of pasture grassland. Areas of parkland occur at Roughwood Park (dating from the 13th century) and The Vache, 'hidden' in the wider landscape. A scattering of earthwork enclosures and barrows occur in woodland providing archaeological interest.

LCA 18.3 LITTLE CHALFONT ROLLING FARMLAND

Designations:

- Chilterns AONB
- Archaeological Notification Sites: 4No.
- Biological Notification Sites: 6No.
- Local Wildlife Sites: 2No.

EVALUATION

Landscape and Visual Sensitivities

Potential landscape and visual sensitivities are:

- 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.
- Long views across open sweeping farmland in the north to wooded backdrops, often to a distant wooded backdrop.
- Stretches lanes/roads through open farmland or enclosed by woodland which retain a rural character.
- Small fields of pre 18th century irregular enclosures.
- Earthwork enclosures and barrows occur in woodland providing archaeological interest
- Historic parkland (some dating from the 13th century) which is unregistered,

Strength of Character/Intactness: The strength of character and intactness of the *Little Chalfont Rolling Farmland* is **moderate**. Key characteristics are conveyed but intactness is influenced by expansion of Little Chalfont and suburbanisation of roads, which reduces the distinctiveness of character. In places, field boundaries are unmanaged with gappy hedgerows.

Strategy/ Vision: 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*.

Landscape Guidelines:

- 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.
- Conserve the areas of woodland and manage to enhance biodiversity value and as a recreational resource.
- Conserve sweeping open views across farmland and seek to avoid locating detracting or interrupting features.
- Conserve the character of rural roads.
- Seek to avoid further expansion of settlement which leads to suburbanisation along roads.

LCA 18.3 LITTLE CHALFONT ROLLING FARMLAND

- Conserve and restore small fields of pre 18th century irregular enclosures.
- Conserve historic elements, such as archaeological sites, monuments and parkland, which provide evidence of past use of the land.

LCA 18.3 LITTLE CHALFONT ROLLING FARMLAND



Rolling landform, with arable fields interspersed with blocks of woodland.



Rough grassland with coniferous woodland backdrop.



Captain Cook Monument located in the grounds of The Vache.

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View across parkland landscape.

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**Appendix 5 Extracts from Chiltern & South Bucks District Councils Chiltern and
South Bucks Townscape Character Study, 2017**

Chiltern & South Bucks District Councils
Chiltern and South Bucks Townscape Character Study
Part 3



1.0 INTRODUCTION

1.1 Background

1.1.1 Chiltern and South Bucks District Councils are preparing a joint local plan. The Chiltern and South Bucks Local Plan will review both Councils planning policies and seek to meet collective development needs through a new local plan to cover the period up to 2036.

1.1.2 In December 2016, the Councils commissioned Chris Blandford Associates (CBA) to undertake a Townscape Character Study (Part 3) for both Districts to inform the joint Local Plan. This Study is the third of a three-part Townscape Character Study undertaken for both Districts. The Chiltern Townscape Character Study comprises the following documents:

- **Chiltern Townscape Character Assessment (February 2011)**
- **Chiltern Townscape Character Assessment: Review of Established Residential Areas of Special Character (February 2011)**
- **Chiltern Townscape Character Assessment: Supplementary Report (October 2013)**

1.1.3 The above reports were prepared by Chris Blandford Associates on behalf of Chiltern District Council. Together, they provide a Part 1 desk-based assessment and a more detailed Part 2 townscape study.

1.1.4 The South Bucks Townscape Character Study comprises the following documents:

- **South Bucks Townscape Character Study: Part 1 Desk-based Assessment** (March 2010, prepared by Chris Blandford Associates for South Bucks District Council).
- **South Bucks Townscape Character Study: Part 2** (July 2015, Revision, prepared by Tibbalds for South Bucks District Council). This Study was adopted by South Bucks District Council for development management purposes in July 2014.

Local Context

1.1.5 Chiltern and South Bucks are predominantly rural districts within Buckinghamshire. Chiltern has a population of around 92,600 and South Bucks has a population of around 68,500, the majority of which live in the main settlements within the districts. Over 88% of Chiltern District and about 87% of South Bucks District is designated as Green Belt. The Green Belt boundaries are drawn tightly around the built up areas of settlements that are excluded from the Green Belt. 72% of Chiltern District is also within the Chilterns Area of Outstanding

Natural Beauty (AONB), which also extends into South Bucks, covering 2.9% of the District. Because of these extensive designations, both districts have traditionally been an area of development restraint, with current planning policy directing necessary development to the main built up areas, protecting the Green Belt from inappropriate development.

1.1.6 The settlements excluded from the Green Belt across Chiltern and South Bucks each have their own distinctive character, which varies from place to place. Many established residential areas within the towns and villages, particularly in Chiltern District, have a distinctive "Metro-land" character, comprising very high quality, low density housing with spacious detached and semi-detached dwellings set in large well-landscaped plots alongside leafy tree-lined streets. Metro-land housing was associated with the extension of the Metropolitan Railway from central London. Metro-land suburbs, predominantly dating to 1920s and 30s, were designed as an escape from the bustle of London to provide the leafy, idyllic 'countryside' lifestyles of the smaller towns that orbited London but were, crucially, connected to the capital by rail. Initially marketed to the upper middle classes who could afford to buy the 'cottages' and the cost of the daily commute into London, the appeal of the Metro-land suburbs gradually filtered down with more and more development aimed at other social groups. In contrast, the centres of some towns and villages within both districts have distinctive tightly knit patterns of more historic Victorian, Edwardian or even older buildings, many of which are listed and included within Conservation Areas.

Purpose

1.1.7 The purpose of the Study is to provide part of the evidence base for developing a consistent Development Management policy approach to the protection of townscape character in the Chiltern and South Bucks Local Plan. Having started along similar lines, the two districts diverged and have ended up with different policy approaches to the protection of townscape character in their respective adopted local plans.

1.1.8 In order to accommodate the joint Objectively Assessed Housing Needs for the plan period up to 2036, the Councils are looking at how to accommodate new housing both in the Green Belt and within the existing urban areas. The Councils wish to safeguard as much of the Green Belt as possible and therefore need to accommodate housing within the urban areas at a higher density where appropriate, whilst

protecting existing townscape character.

1.1.9 In this context, the key objectives of the Part 3 Townscape Character Study are to:

- Review the different policy approaches to protection of townscape character in the Councils' existing local plans and assess the scope for alignment.
- Undertake a consistent townscape character assessment of settlements excluded from the Green Belt for both Districts.
- Identify any areas in the settlements with potential for change (including areas where density may be increased with least harm to the townscape character of the settlement).
- 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.
- Provide appropriate planning and design principles to guide appropriate change within the different townscape character typologies.

Scope

1.1.10 The Study includes settlements that are currently excluded from the Green Belt within Chiltern and South Bucks Districts, with the exception of Taplow Riverside and Denham where it is proposed to remove these settlements from the Green Belt through the new joint Local Plan. The settlements identified by the Councils for inclusion in the Part 3 Townscape Character Study are listed below (see **Figure 1.1**).

1.1.11 For each settlement, the Study is limited to assessment of the established built-up areas within the Settlement Boundaries as defined by the Councils.

Chiltern Settlements:

- Amersham
- Little Chalfont
- Chesham
- Chalfont St. Peter
- Chalfont St. Giles
- Great Missenden
- Prestwood
- Heath End
- Holmer Green
- Knotty Green
- Chesham Bois
- Seer Green
- Penn
- Nashleigh Hill and Lycrome Road

South Bucks Settlements:

- Beaconsfield
- Gerrards Cross
- Denham Green
- Burnham
- Farnham Common
- Farnham Royal
- Stoke Poges
- Iver Heath
- Iver Village
- Richings Park
- New Denham & Willowbank
- Taplow Riverside
- Denham

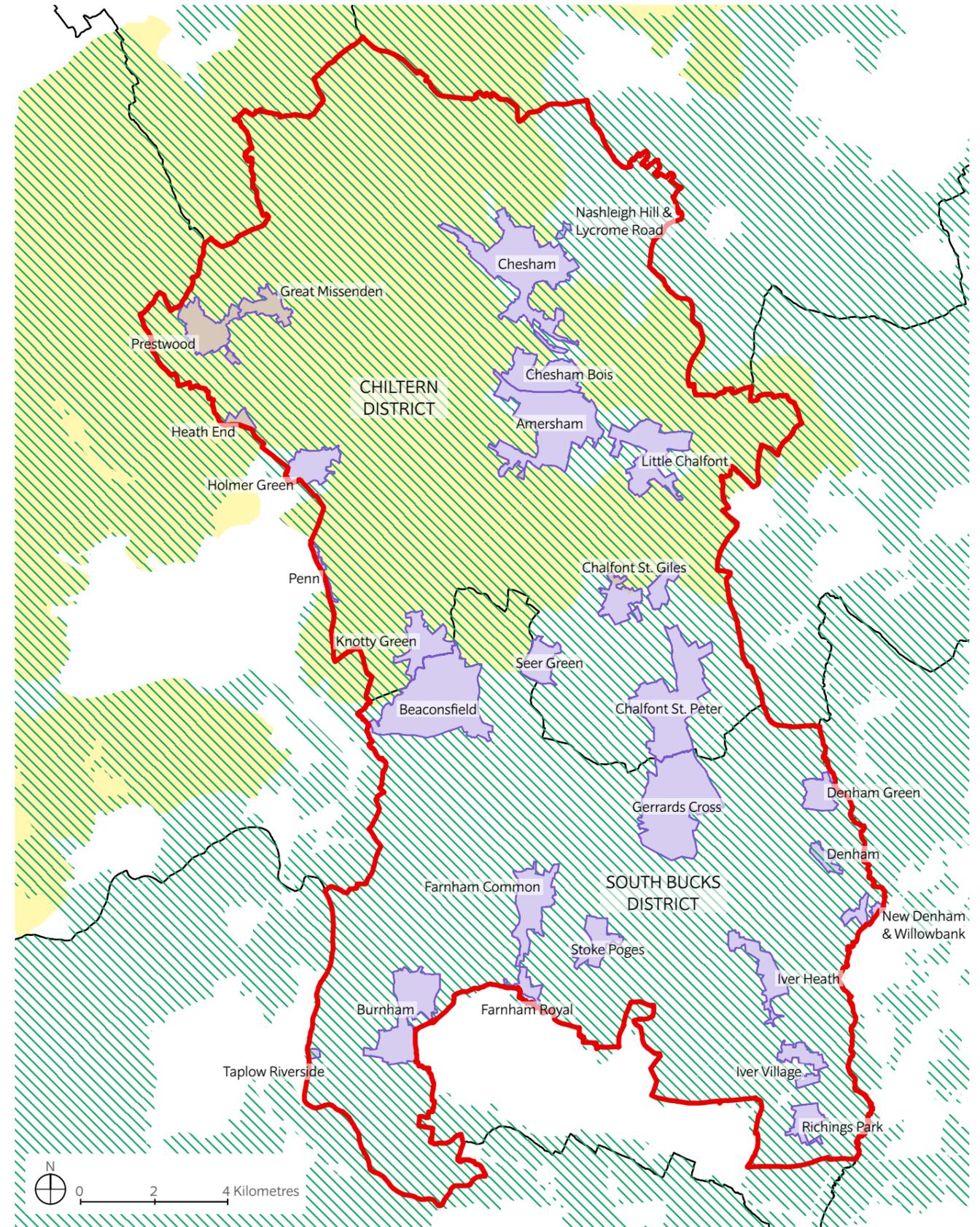
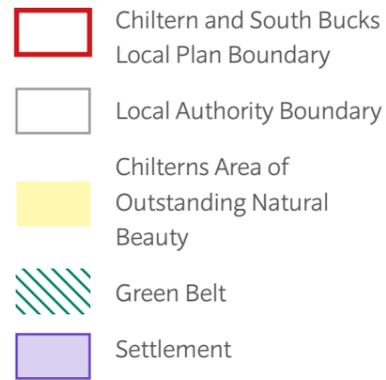


Figure 1.1 - Settlements within Study

1.2 Approach

1.2.1 The key steps in preparing the Study are outlined below.

1. Review of Local Plan Policy Approaches

1.2.2 **Section 1.3** reviews the different approaches to protection of townscape character in the Councils' existing local plan policy, and considers the scope for alignment in the new Chiltern and South Bucks Local Plan taking into account NPPF requirements.

2. Assessing Townscape Character

1.2.3 **Sections 2.0** and **3.0** set out a consistent and up-to-date townscape character assessment of the settlements within both Districts. This draws on the earlier work, supplemented by additional research/review of latest available data, site visits and stakeholder consultation.

1.2.4 In the absence of any specific published methodology for undertaking townscape character assessment in the UK, the overall approach to assessing townscape character in this Study is based on established character assessment and urban design principles provided by the following good practice guidance:

- An Approach to Landscape Character Assessment (Natural England, 2014)
- Conservation Area Designation, Appraisal and Management : Historic England Advice Note 1 (Historic England, 2016)
- Planning Practice Guidance – Design (DCLG, 6 March 2014)

1.2.5 For each settlement, the assessments are structured as follows:

- **Location** – a brief description of the settlement's location and physical context.
- **History** – a summary of the settlement's historic development (further details can be found in the earlier studies).
- **Character** – a summary of the settlement's character (further details can be found in the earlier studies). This is supported by a character analysis map (highlighting the particular townscape nodes, topographical and landscape features, open spaces and views that are distinctive features of the settlement) and a map showing the character typology defined for the settlement (a character typology is a systematic classification of forms of development that have characteristics or traits in common).

- **Townscape Values** – a summary of the key townscape characteristics and special qualities valued by the local community (based on feedback from the stakeholder consultation workshops - see below for details).
- **Areas with Potential for Change** – identification of areas and issues with particular potential for change (including areas where density may be increased with least harm to the townscape character of the settlement).
- **Areas of Special Character** – where identified, assessment and mapping of areas with high quality/special townscape character that are particularly vulnerable to change, together with a summary justification for protection from intensification and other forms of insensitive development (see below for details).

1.2.6 The townscape character assessments for the South Bucks settlements are broadly consistent with the 2015 South Bucks Townscape Character Study: Part 2, modified where necessary to ensure consistency with the Chiltern assessments.

3. Planning and Design Principles

1.2.7 Informed by the assessments of each settlement's townscape character, planning and design principles are provided in **Section 4.0**. These principles are intended to provide guidance for decision-making by the local planning authority and to assist applicants in formulating development proposals.

1.2.8 Planning and design principles are provided for the following townscape character typology identified by the Study:

- Tightly Formed Centres
- Clustered Centres
- Woodland Roads
- Green Suburban Roads
- Suburban Roads
- Open Plan Suburban
- Formal Suburban
- Inconsistent Suburban
- Park Edge
- Town Centre Fringes
- Out of Town Commercial
- Apartments

1.2.9 The planning and design principles are broadly consistent with those defined by the 2015 South Bucks Townscape Character Study: Part 2. Where necessary, these have been modified to ensure consistent application across both districts.

Stakeholder Consultation Workshops

1.2.10 Stakeholder consultation and engagement was undertaken to inform the Study through three workshops held on the following dates across the Districts:

- 6th February 2017, 4.30-6.30pm - South Bucks Council offices in Denham.
- 8th February 2017, 4.30-6.30pm - Chiltern District Council offices in Amersham.
- 9th February 2017, 4.30-6.30pm - Beaconsfield Town Council offices in Beaconsfield.
- The workshops were facilitated by CBA with support from the Councils' planning officers. The informal drop-in sessions provided an opportunity for parish councils, other community groups and local residents to contribute their views on what they value most about the existing character of their towns or villages. Participants were invited to provide written comments on the townscape characteristics and special qualities of the settlements that they particularly valued, including identification of specific areas. A total of 44 written responses were received from this process in respect of some, but not all, settlements within the scope of the Study. Where applicable, this feedback informed the identification of community townscape values and understanding of perceived threats to the existing character of a settlement.

1.2.11 The Study's recommendations for the designation of Areas of Special Character will be subject to further consultation as part of the public consultation on the draft Chiltern and South Bucks Local Plan and its evidence base.

Defining Areas of Special Character

1.2.12 'Areas of Special Character' have locally distinctive patterns of townscape characteristics and special qualities that make them different from the character of other parts of a settlement. Due to this distinctiveness, these Areas are particularly vulnerable to intensification and other forms of insensitive development and are therefore considered to justify protection by designation in the Chiltern and South Bucks Local Plan.

1.2.13 The Areas of Special Character are defined by a particular combination of townscape characteristics rather than by a single characteristic. Areas of Special Character may not necessarily be of the highest architectural value, and their distinctive character may be defined by a combination of townscape characteristics such as:

Landscape Character

- Areas that are in or have open views to sensitive or distinctive landscapes.
- Areas that are visible from sensitive or distinctive landscapes.
- Areas that are well integrated into the natural environment.
- Areas where landscape is the most dominant feature.

Townscape

- Areas where building set-backs, rhythms and gaps create distinctiveness.
- Areas with a particularly homogeneous townscape and layout.
- Areas where the plot pattern and rhythm are of particular distinctiveness/homogeneity.

Built Form

- Areas with distinctive pattern of building forms (roofscapes, heights, shape) typically characterised by uniform building types distinctive to one area or by a variety that in itself creates character.
- Areas with characteristic use of materials.
- Areas with architecturally important buildings.

Vegetation and Hard Landscape

- Areas with mature or special planting.
- Areas where trees and soft landscape play a key role in the character.

Boundary Treatments

- Areas with distinctive and consistent boundary treatments such as tall mature hedgerows.

1.2.14 The Areas of Special Character for the Chiltern and South Bucks Local Plan were defined by reviewing the existing adopted/proposed designations in each district on a consistent basis against the above considerations. This involved:

- Reviewing the boundaries of the adopted 'Established Residential Areas of Special Character' defined by Policy H4 of the Chiltern Local Plan and the proposed 'Areas of Little Change' recommended by the 2011 Chiltern Townscape Character Assessment.
- Reviewing the boundaries of the adopted 'Areas of Special Character' defined by the 2015 South Bucks Townscape Character Study: Part 2.

1.2.15 An initial sift was undertaken to exclude those parts of Established Residential Areas of Special Character/Areas of Little Change in Chiltern that are designated as Conservation Areas for consistency with the South Bucks approach.

1.2.16 The boundaries of the recommended Areas of Special Character for the South Bucks settlements are consistent with the 2015 South Bucks Townscape Character Study: Part 2. The assessments justifying the Areas of Special Character in this Study are broadly consistent with the South Bucks Townscape Character Study: Part 2, modified where necessary for consistency across both districts.

2.2 Little Chalfont

Location

2.2.1 The settlement of Little Chalfont is situated to the east of Amersham (see **Figure 1.1**) on an area of chalk plateau above the Chess Valley, which forms a gently meandering wooded corridor to the north of the settlement.

History

2.2.2 Little Chalfont was situated within the historic parish of Amersham. The oldest surviving building is a 17th century timber-framed house called The Piece. Several 18th century houses, farms and cottages are present within the current fabric of the village. Part of the area was occupied by Amersham Common and extractive pits, together with tile and brickworks. In the 18th century a turnpike road was created between Hatfield and Reading, passing through Little Chalfont. A significant number of extractive pits and quarries are known to have existed in the area in the 19th and 20th centuries. A row of 19th century cottages also survive from this time.

2.2.3 Prior to the opening of the railway station, Little Chalfont consisted of only a few small clusters of buildings at Burtons Lane, Snells Lane and White Lion Road. The first housing developments following the construction of the railway were large Edwardian Villas, set in large gardens, built along existing roads such as Burtons Lane, Cokes Lane, Amersham Road and White Lion Road, and also along new roads such as Village Way and Harewood Road. Loudhams Road was constructed adjacent to the railway and contained a mix of detached and semi-detached houses and bungalows. Elizabeth Avenue, Chenies Avenue and Bedford Avenue to the north of the station show clear signs of planning with straight roads and generous building plots being laid out by the landowner.

2.2.4 The 1920s and 30s were a time of rapid housing growth and several developments occurred at this time. Large detached houses extended further along Burtons Lane and the land behind Burtons Lane was developed with the creation of Burtons Way. Further cul-de-sacs were laid out at Loudhams Wood Lane, Latimer Close and Park Grove. The new taste for curvilinear street patterns can be seen in the development between Elizabeth Avenue and the Railway completed at this time. Development here tended to be more compact with frequent use of semi-detached and four-in-a-row housing.

2.2.5 The period from 1955 to 1976 saw another considerable phase of housing development in Little Chalfont. Estates of detached and semi-detached houses were developed to the north of the railway. An estate of large houses set within very large gardens was built at Doggetts Wood. Parcels of land were developed using cul-de-sacs at Maplefield Lane, Yarrowside, Linfields and Birkett Way, while further ribbon development occurred along Burton's Lane, Long Walk and

Lodge Lane. Development also occurred on backland between White Lion Road and the Railway. The White Lion Estate was constructed by the Council in the 1960s. It consists of several blocks of four storey flats, arranged around central courtyards (refurbished in the 1990s and the name changed to Chiltern Heights). Post-1976 development comprises small areas of infill, and the development of offices in the village centre. Small areas of redevelopment have also occurred.

Character

2.2.6 Today, the village is structured around the railway, with higher density development predominantly to the north of the railway, and lower density to the south. Overlapping the character typologies identified in this study are particular townscape nodes, topographical and landscape features, open spaces and views that add further distinctiveness to Little Chalfont as a whole (see **Figure 2.2a**). These are:

- Village centre with an Edwardian Shopping parade
- Areas of semi-rural 'green' streetscape character, and mature trees in rear gardens and along boundaries
- Areas of low density pattern of detached houses, set within large front and back gardens, designed in the style of 20th century garden suburbs; detached villas on spacious plots, in the arts and crafts style, typical of metro-land developments
- 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
- Areas with a predominance of original design details including pebbledash render and decorative timber
- Key historic features including a 17th century timber-framed farmhouse and 18th century timber-framed barn
- Grass verges, hedges and mature trees contributing to a semi-rural character
- Areas of new development in the centre and northwest of the settlement.

2.2.7 The following character typologies have been identified in Little Chalfont (see **Figure 2.2b**):

- Tightly Formed Centre
- Town Centre Fringes
- Out of Town Commercial
- Green Suburban Roads
- Formal Suburban
- Inconsistent Suburban
- Open Plan Suburban
- Suburban Roads
- Woodland Roads
- Apartments

2.2.8 The characteristics of the above typologies are described in **Section 4.0**.

Further details about the history of the settlement's evolution and character of the townscape can be found in the 2011 Chiltern Townscape Character Assessment



Figure 2.2a - Little Chalfont: Character Analysis

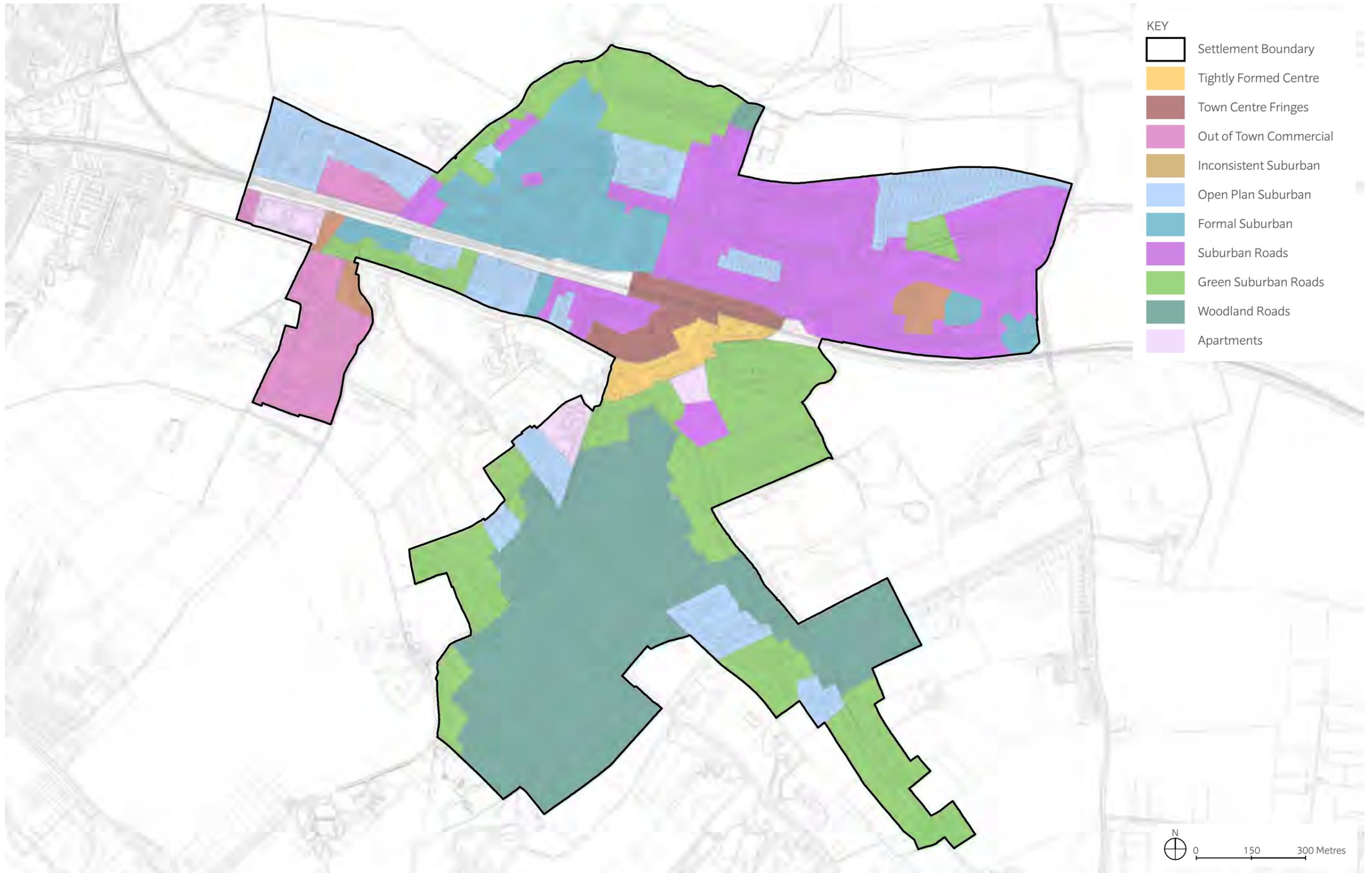


Figure 2.2b - Little Chalfont: Character Typology

Townscape Values

2.2.9 Based on the feedback from the stakeholder workshops held in February 2017, the key townscape characteristics and special qualities valued by the local community can be summarised as follows:

- Low density development of detached, high quality houses of individual character
- Residential areas with no street lighting and no roadside footpaths
- Mature trees and hedgerows separating properties, open driveways, few fences and off road parking

Areas with Potential for Change

2.2.10 The following have been identified as areas with particular potential for change (based on currently unimplemented development sites identified in the Chiltern District Council and South Bucks District Council Draft Housing and Economic Land Availability Assessment Update, May 2017):

- Pollards Wood, Nightingales Lane
- Citygate and Adjoining Land, Chalfont Station Road
- Area around Chalfont and Latimer Station, Little Chalfont
- 68 to 78 Elizabeth Avenue, Little Chalfont
- 178 White Lion Road, Little Chalfont
- 206 White Lion Road, Little Chalfont
- Rear of St Georges Hall, White Lion Road
- Lodge Farm, Lodge Lane
- Land Between Chenies Parade and Garage, Chalfont Station Road
- The Donkey Field, Burtons Lane
- Little Chalfont Tennis Club, Pavilion Way

2.2.11 Any proposals for these sites should take regard of the characteristics of the area they are located in as well as the surrounding context.

2.2.12 In addition, the following have been identified as issues with particular potential for change: (see **Figure 2.2a**)

- Reduction of commuter parking in residential streets.

2.2.13 These areas have the potential to be improved in terms of their quality and positive contribution to the overall quality of the character area they sit within.



Cokes Lane, Little Chalfont



Elizabeth Avenue, Little Chalfont



Old Saw Mill Place, Little Chalfont

Areas of Special Character

2.2.14 The following residential areas have been identified as Areas of Special Character (see **Figure 2.2c**):

- Burtons Lane to Doggetts Wood Lane



Figure 2.2c Little Chalfont: Areas of Special Character

1. Burtons Lane to Doggetts Wood Lane Area of Special Character

- 2.2.15 The Burtons Lane to Doggetts Wood Lane Area of Special Character (ASC) is located in the south of Little Chalfont. It is a high quality example of the 'Woodland Roads' and 'Green Suburban Roads' character typologies, with a small area of high quality 'Open Plan Suburban', and is particularly well preserved and maintained (see **Figure 2.2c**). It comprises much of the settlement south of the railway, including Burtons Lane, Long Walk, Loudhams Wood Lane, Burtons Way, Harewood Road and Doggetts Wood Lane.
- 2.2.16 Plots are predominantly regular with a consistent width and rhythm along individual roads within the ASC. Properties are set along roads with varying levels of traffic. Nightingales Lane, which heads south from the settlement towards Chalfont St. Giles is a busier route, whilst many of the other roads are quieter roads with little traffic. Many of the roads in this ASC are private.
- 2.2.17 Within the 'Woodland Roads' character type (for example, Doggetts Wood Close), housing predominantly comprises large, detached properties built in a variety of architectural styles and set within large, secluded gardens. Consistency is created by the regular plot pattern and green streetscape character of mature trees, high boundary hedges and walls. Mature trees within front gardens and trees/hedgerows lining the road corridors contribute to a semi-rural, 'green' streetscape character, which is not visually dominated by the adjacent built form. Many houses located deep within their plot, can only be glimpsed through gates and gaps in boundary hedges. Trees make a substantial contribution to the character and sense of enclosure of the ASC.
- 2.2.18 In the areas where the 'Green Suburban Roads' character dominates, such as along Village Way and Burton's Lane, properties are predominantly set back a short distance from the road, and there are grass verges in places. Thick hedges further enhance the semi-natural, soft feel of the streetscape. Properties along Village Way still display many of their original, varying façade treatments, such as pebbledash, render or decorative timber.
- 2.2.19 The small area of Open Plan Suburban typology along Birkett Way demonstrates a consistency of architecture and streetscape treatments, with predominantly grassed and open front gardens sweeping down to the road. Some trees and shrubs add variety to this streetscape. The low density pattern of development common cross this ASC is evident.
- 2.2.20 In newer developments the character of the ASC is weakened in places by the use of hard surfaces in front gardens, hard boundary treatments and buildings located closer to the boundary and limiting the space for landscape to fully mature.

Summary/Justification

- 2.2.21 This area has been identified as an Area of Special Character due to its high quality townscape. It 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.



4.4 Woodland Roads

4.4.1 Woodland roads are characterised by their landscape quality and high sensitivity due to the pattern of large plots, mature vegetation, and wooded townscape character (see **Figure 4.3**). These areas are often located close to the edge of settlements.

4.4.2 The following characteristics of this typology have been identified:

Townscape

- Large, detached houses set within large plots.
- Long and gently winding roads are generally part of a connected block pattern. These roads are quiet with little through traffic.
- Houses are typically set back well within their plots.
- Fairly regular pattern of plot width and length.
- Houses are set amongst woodland landscape creating a high sense of enclosure to the road.
- Houses are generously spaced with room for vegetation between building and boundary.
- Houses are informally arranged with no consistent alignment. More uniform building lines exist along main roads.
- When located at the edge of a settlement they are often placed on one side of a road with mature woodland running along the other. This creates a soft edge to the settlement.

Built Form

- Built form is subservient to the landscape character
- Range of individual architect designed houses of varied architectural styles, materials and detailing, and generally an asymmetrical, informal architectural composition.
- Generally 2 storeys (sometimes with the upper storey partly or fully within the roof space).
- Older houses are well integrated into the topography without the use of retaining walls.
- Garages are often separated from the buildings, to the side or in front of the main house.

Landscape Character and Vegetation

- Mature woodland and hedges are extremely important to the character, especially where areas fall within or near SSSI designations.
- Tall mature vegetation and trees in front gardens create privacy, with most houses only glimpsed behind lush planting.
- Often have backdrop or views to the surrounding rural or woodland landscape. This is especially important to the character of areas that face or back on to AONB, Ancient Woodland or SSSI designated land.
- Typically no two buildings can be seen together - they are separated by landscape.
- The landscape is semi-natural with buildings forming around existing trees and woodland.

Hard Landscape

- Roads often have no pavement or simple narrow pavements along both sides of the road.
- Very few highway markings.

Boundary Treatments

- Tall well maintained hedgerows are the dominant boundary treatment.
- Typically houses are accessed by driveways, often surfaced in gravel.



Figure 4.3 Character Type C: Typical Woodland Roads

Threats to Character

The above characteristics can be threatened or diluted by the following:

- A level of homogeneity in style of new buildings that fails to contribute to the diversity of architecture.
- New dwellings do not relate well to the existing topography, using retaining walls rather than working with existing levels.
- New dwellings have hard surfaced front gardens - this diminishes the green landscape character of this typology.
- 2 storey buildings with a large area of additional accommodation in the roof and/or undercroft parking appear out of scale with the surroundings
- Use of high, hard boundary treatments such as walls and railings.
- Buildings are too close together or too near boundaries, giving less space for landscape.
- Symmetrical, formal design of new houses, i.e. three bays with central portico.



Seer Green



Farnham Royal

© Tibbalds



Farnham Common

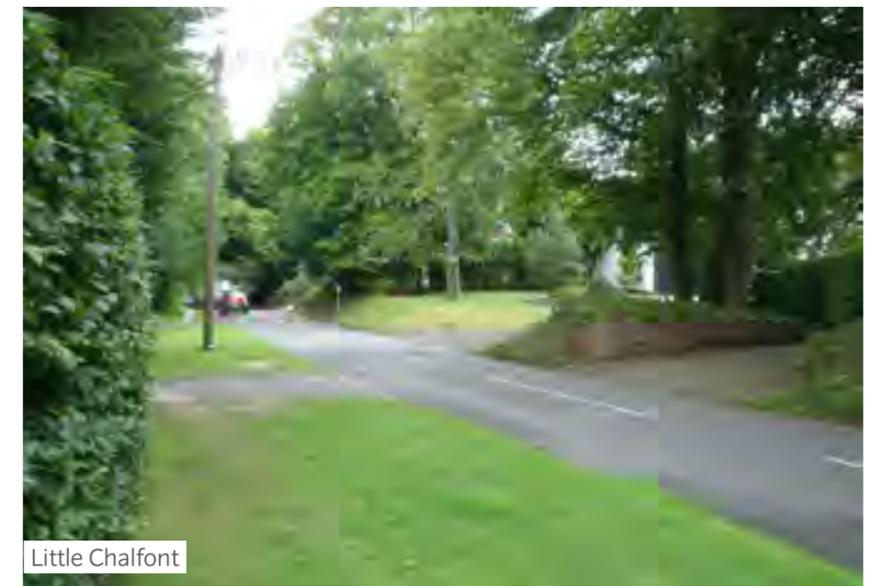
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Chalfont St. Giles

Planning and Design Principles: Woodland Roads

- Retain woodland character by retaining trees and hedgerows around buildings and in backdrop and views to and from homes
- Allow enough space on plot for new landscape to mature.
- Retain existing plot ratios and rhythm.
- Front gardens should generally be planted, not hard landscaped.
- Building heights should be limited to two storeys (including accommodation in the roof).
- Where boundary treatments are tall enough to require planning permission, they should avoid use of hard materials such as walls and railings. If railings are constructed they should be placed with hedges.
- Buildings should relate well to topography and avoid the use of retaining walls.
- A variety of architectural styles should be encouraged.
- Conserve roadside treatment and avoid over engineered highway design and road markings.
- Where areas are located around edges of settlements, preserve them as a soft green edge.



Little Chalfont

4.5 Green Suburban Roads

4.5.1 This typology refers to areas characterised by plots arranged in a regular manner with a strong landscape character (see **Figure 4.4**).

4.5.2 The following characteristics of this typology have been identified:

Townscape

- Large, predominantly detached houses set in large plots.
- Plots are typically regular in width and pattern.
- Roads are relatively quiet with little through traffic.
- Houses are generally arranged parallel to the roads with slightly staggered building line.
- Houses are set behind medium to large front gardens.
- Gaps between houses are fairly consistent and often contain planting such as trees and hedges.
- There is generally limited on-street parking in these areas, however, in places there is some commuter parking on streets, such as near Beaconsfield Station.
- This typology includes some distinctive areas of townscape, such as the area around St. Michaels Green in Beaconsfield, formed around an open green space in front of the listed St Michaels Church. This more formal arrangement is continued with the composition of Wilton Crescent which gently curves around Beaconsfield Tennis Club creating a well defined space for recreation.

Built Form

- Along some roads the architectural style and materials is generally homogeneous.
- Other areas such as the Gregories Road area in Beaconsfield have individually designed houses with little homogeneity.
- Simple building forms, generally 2 storeys, often one storey and inhabited roof space.
- Buildings and landscape are of equal importance in this character typology.

Landscape Character and Vegetation

- Roads have a green, leafy character due to mature landscape and hedgerows that line the road corridor.
- In most areas there is a green backdrop to houses due to planting in back gardens.
- Some areas have a mature woodland backdrop.
- Landscaping is well designed & generally well maintained.
- Plots have medium to large front gardens with soft landscaping
- Some roads contain formal tree planting along the edge of the road

Hard Landscape

- Roads have pavements either side often including a grass verge.
- There are a few examples where pavements are not present, however, these are relatively unusual.

Boundary Treatments

- Well maintained hedgerows are the dominant boundary treatment.
- Boundary treatments are generally not tall enough to hide buildings from the road - buildings are generally visible at first floor level from the road.



Figure 4.4 Character Type D: Typical Green Suburban Roads

Threats to Character

The above characteristics can be threatened or diluted by the following:

- New dwellings have hard landscaped front gardens and hard boundary treatments - reducing the landscape character.
- Buildings that are spaced close together, not allowing sufficient space for tree planting and so reducing the landscape character
- Newer houses often have two storeys with large areas of additional accommodation in the roof. The houses tend to appear bulky compared to the existing character. This is exaggerated in some flatted developments that do not follow established building rhythms
- Use of hard boundary treatments such as high walls, or, metal railings



Planning and Design Principles: Green Suburban Roads

- Building heights should be limited to two storeys - this includes development in the roof space.
- Maintain existing building lines, set backs and plot ratios.
- 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.
- Grass verges and street planting should be retained.
- Where boundary treatments are tall enough to require planning permission, they should avoid use of hard materials such as walls and railings. Railings with hedges or low walls with hedges may be acceptable.
- Garages should be placed in line with buildings or behind properties, not at the front of the plot.
- New developments should have soft landscaped front gardens.
- Highway solutions and highway markings should be carefully considered and not over-engineered.
- Preserve the unique townscape and open spaces around St Michaels Church in Beaconsfield

Appendix 6 Development affecting the setting of the Chilterns AONB - 2011



Chilterns Conservation Board – Position Statement



View from Coombe Hill (© Chris Smith)

Development affecting the setting of the Chilterns AONB

Introduction

1. Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England and Wales are conserved and enhanced. In policy terms they have the same planning status as National Parks.
2. The Chilterns Conservation Board is the body set up by Parliament to conserve and enhance the natural beauty of the Chilterns AONB and increase the understanding and enjoyment of the special qualities of the AONB. The Board also has a duty to have regard to the social and economic wellbeing of those who live and work in the Chilterns AONB.

Purpose of this Position Statement

3. This Position Statement is intended to provide guidance to local planning authorities, landowners, developers and other interested parties in connection with the need to consider the impacts on the AONB of development and land management¹ proposals which lie outside it but within its 'setting'.
4. The Board considers that, although it does not have a defined geographical boundary, the setting of the Chilterns AONB is the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Chilterns AONB.
5. This Statement expands upon issues raised in the Chilterns AONB Management Plan 2014-2019: A Framework for Action², in particular: the third bullet point of the Vision; Key Issue 24 and Policies L4, L5 and L7 in the landscape chapter; Policies B1 and B2 in the biodiversity chapter; Key Issues 3, 5 and 8 and Policies HE3, HE4, HE5 and HE7 in the historic environment chapter, and paragraph 2 in the introduction, Key Issues 2 and 8 and Policies D8, D9, D12 and D13 in the development chapter³.

Vision: The setting of the Chilterns is valued and protected by ensuring development adjacent to the AONB also respects its national importance.

Policy L4: The distinctive character of buildings, rural settlements and their landscape setting should be conserved and enhanced.

Policy L5: Developments which detract from the Chilterns' special character should be resisted.

¹ "Development" includes transport and other infrastructure as well as proposals requiring planning applications. "Land management" includes tree planting, energy crops, and drainage schemes.

² Chilterns AONB Management Plan 2014-2019: A Framework for Action, Chilterns Conservation Board (2014) see: http://www.chilternsaonb.org/conservation/management_plan.html

³ This version of the statement is Revision 1 December 2014 – the policy extracts and other information reflect the adopted version of the Chilterns AONB Management Plan 2014-2019 (March 2014), the National Planning Policy Framework (March 2012) and National Planning Practice Guidance (March 2014)

Policy L7: The quality of the setting of the AONB should be conserved by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns.

Policy B1: Delivery of Biodiversity 2020 Strategy outcomes within the AONB and its setting should be supported.

Policy B2: Action to conserve and enhance the condition of priority habitats and protected sites (statutory and non-statutory) within the AONB and its setting should be supported.

Policy HE3: Development, other land use changes and management practices which would harm the significance of nationally important designated and undesignated sites, and locally important historic assets and their settings will be resisted.

Policy HE4: The conservation of the historic environment (including the setting of important sites and features) should be based on best practice.

Policy HE5: The design and location of all development should be sympathetic to the character of the historic environment, including the setting of historic assets.

Policy HE7: The stewardship of the wider historic environment and individual sites and features (including their setting) should be supported by a high level of understanding of the character and management needs.

Policy D8: The retention or creation, and long term maintenance, of green infrastructure should be sought when development is proposed in, or adjacent to the AONB.

Policy D9: Full account should be taken of the likely impacts of developments on the setting of the AONB.

Policy D12: Developments should be sought that represent the highest environmental and design standards whilst complementing the character of the AONB.

Policy D13: The use of renewable energy (particularly wood fuel, solar, hydropower and ground source heat pumps) should be encouraged in appropriate locations.

6. Views out of the AONB and into its surrounding areas can be very significant. Development proposals that affect views into and out of the AONB need to be carefully assessed, particularly in line with the National Planning Policy Framework and National Planning Practice Guidance, to ensure that they conserve and enhance the natural beauty and landscape character of the AONB.

7. The need to consider the impact of proposals within the setting of the AONB is set out in the National Planning Policy Framework, National Planning Practice Guidance, relevant legislation and planning policies and in guidance from Natural England and English Heritage. Those pieces of policy and guidance that are considered to be relevant are detailed in Appendix A.
8. The setting of AONBs has been considered by Inspectors in various planning appeals. Extracts from relevant appeals are detailed in Appendix B.
9. The special qualities of the Chilterns AONB are identified in the AONB Management Plan and are briefly set out in Appendix C.
10. This Statement is intended to be used to secure appropriate policies on this issue in Core Strategies and Local Plans and other policy documents which relate to the Chilterns AONB and assist in the decision making process with respect to proposals for development or land management outside the AONB.
11. The need to consider the potential impact of developments within the setting of the AONB on the natural beauty and special qualities of the AONB itself are explicitly referred to in a number of adopted development plans in relation to the Chilterns AONB. Whilst some developments may have adverse impacts, circumstances can be envisaged where other developments or changes in land use (for example tree planting outside the AONB) could enhance the AONB by mitigating or removing unsightly existing structures which may adversely impact upon the AONB. In addition, other strategies such as Green Infrastructure plans, Biodiversity Opportunity mapping and landscape character assessments, may also provide advice about enhancement.
12. **The Board will seek to ensure that the importance of considering the impact of development and land management proposals outside the Chilterns AONB on the natural beauty and special qualities of the AONB is made clear in all Core Strategies and Local Plan documents and in policies in other relevant documents.**
13. **The Board will expect local authorities, in accordance with their duties under Section 85 of the Countryside and Rights of Way Act 2000, to be mindful of both the possible positive and negative impacts of a development within the setting of the AONB on the natural beauty and special qualities of the AONB when determining planning applications. When significant impacts are likely the Board would like its views to be sought.**
14. 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.

15. Examples of adverse impacts will include:

- 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;
- Breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and/or movement (viaducts, chimneys, plumes or rotors for example);
- The visual intrusion caused by the introduction of new transport corridors, in particular roads and railways;
- Loss of tranquillity through the introduction of lighting, noise, or traffic movement;
- 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;
- Loss of biodiversity, particularly in connection with those habitats or species of importance in the AONB;
- Loss of features of historic interest, particularly if these are contiguous with the AONB;
- Reduction in public access and detrimental impacts on the character and appearance of rural roads and lanes, and
- Increase in air or water pollution.

16. Adverse impacts might not be visual. The special qualities of the Chilterns AONB include tranquillity. A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB.

17. The Board will monitor, comment and report on relevant planning applications and decisions relating to development within the setting of the Chilterns AONB which may impact on the natural beauty and special qualities of the AONB.



Chilterns Conservation Board Planning Committee site visit, Ivinghoe Beacon (© Chris Smith)

Avoiding Harm to the Setting of the Chilterns AONB

18. 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 or affecting the setting of the Chilterns AONB, the Chilterns Conservation Board supports the following:

- Measures to consider the impact on the setting of the AONB, including where required through Landscape and Visual Impact Assessments, ecological surveys or historical 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;
- Consideration not just of the site but also the landscape and land uses around and beyond it;
- Careful consideration of colours, materials and the reflectiveness of surfaces;
- Restraint and care over the installation and use of street lighting, floodlighting and other external lighting to prevent harm to the dark night skies of the AONB and its setting;
- The grouping of new structures and buildings close to existing structures and buildings to avoid new expanses of development that are visible and out of context (though any likely detrimental impact on historic buildings or groupings will need special consideration to avoid insensitive development), and
- Comprehensive mitigation measures, for example including landscaping and open space that incorporates only native species (where possible contributing to BAP targets and the provision of Green Infrastructure), and noise reduction (though landscaping in certain contexts can be damaging to historic features, deposits, landscape or character so will require careful consideration).

19. It is considered that many issues in relation to new development within the setting of the Chilterns AONB can be resolved through careful design, appropriate materials, location and layout and mitigation measures from landscaping to the use of minimal, well-directed and full cut-off street (and other external) lighting.

20. The Board is willing to enter into pre-application consultations to ensure full attention is given to these factors and to assist in the process at the earliest opportunity.

NOTES

The Chilterns Conservation Board has the statutory duty⁴ to pursue the following two purposes:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) to increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board shall seek to foster the economic and social well-being of people living in the AONB.

This is one of a series of position statements published by the Board which help to expand on the Board's policies within the Chilterns AONB Management Plan or explain the Board's approach to new and emerging issues (renewable energy for example). Further information and advice is contained in the following: The Chilterns Buildings Design Guide and the associated supplementary technical notes on local building materials, the Environmental Guidelines for the Management of Highways in the Chilterns and The Making of the Chilterns Landscape. All of these can be found on the Board's website.

The Board is comprised of members nominated by the local authorities, elected parish council appointees and individuals appointed by the Secretary of State. The Board, formed in December 2004, is the only organisation that looks after the AONB as a whole.

The Chilterns AONB was designated in 1965 and extended in area in 1990. It is one of 38 Areas of Outstanding Natural Beauty across England and Wales. It occupies 833 square kilometres and is a landscape of equal importance to National Parks such as Snowdonia and the Lake District.

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⁴ Section 87, Countryside and Rights of Way Act 2000

Policy guidance on the consideration of development proposals within the setting of protected landscapes

National legislation and guidance

1. Section 85 of the **Countryside and Rights of Way Act 2000** places a statutory duty on all relevant authorities requiring them to have regard to the statutory purpose of AONBs when coming to decisions or carrying out their activities relating to, or affecting land within these areas.
2. Guidance on how the implication of this duty and how it may be discharged was issued by Defra in 2005⁵. This includes the statement *“Additionally, it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these areas”*. The Guidance includes a list of relevant authorities, although this is not definitive.
3. **Natural England** has published more detailed guidance in 2010⁶, including case studies. It includes a case study from the Northumberland National Park regarding *“Working to ensure policies include the impact on National Parks from development beyond their boundaries”*.
4. Policy 113 of the **National Planning Policy Framework** states that *“local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks”*.
5. Paragraph: 012 of the renewable and low carbon energy section of the **National Planning Practice Guidance** (Reference ID: 5-012-20140306) states, in connection with active solar technologies, that “where a planning application is required, factors to bear in mind include: ... the effect on a protected area such as an Area of Outstanding Natural Beauty or other designated areas”.
6. This concept of the significance of setting has to be recognised with respect to protected landscapes (AONBs and National Parks). **Natural England’s published spatial planning position**⁷ considers, in Position 5, the protection and enhancement of protected landscapes: *“Spatial planning policies and decisions should ensure the highest levels of protection and enhancement for England’s protected landscapes, habitats, sites and species”*. The explanatory text states

⁵ Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads. Defra (2005)

⁶ “England’s statutory designations: A practical guide to your duty of regard” Natural England NE243 (2010)

⁷ Natural England’s Spatial Planning Position (2009), see: http://www.naturalengland.org.uk/Images/PlanningPosition_tcm6-16604.pdf

“Natural England interprets the protection and enhancement of all sites, habitats and landscapes widely. This includes safeguarding their character, qualities and features, including where appropriate, their settings”.

7. Natural England has published ‘**Making Space for Renewable Energy – Natural England’s approach to assessing on-shore wind energy development**’.⁸ This includes the statement *“Natural England regards the setting of protected landscapes as being potentially influential on the conservation of the special qualities of the National Park or AONB concerned”.*

8. This guidance continues *“Spatial plans should include policies that take into account the sensitivity of the setting of protected landscapes”,* and *“The potential for developments to dominate the setting of protected landscapes requires careful consideration”.*

9. The **Overarching Energy National Policy Statement (NPS) EN-1** includes⁹ the following statement (paragraph 5.9.12):

“The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.”

10. The concept of ‘setting’ is set out in the legislation¹⁰ and national policy¹¹ relating to designated heritage assets. Setting is defined in Annex 2 of the **National Planning Policy Framework** as *“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”.*

11. Helpful guidance on the consideration of the setting of heritage assets is given in the ‘**Historic Environment Planning Practice Guide**’ published by English Heritage in March 2010¹². Setting is said to be *“the surroundings in which an asset is experienced. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not”* (paragraph 113). The guidance goes on to say that *“For the purposes of spatial planning, any development of change capable of affecting the significance of a heritage asset or peoples experience of it can be considered as falling within its setting”* (paragraph 118), and *“Transport proposals can affect the setting of heritage assets”* (paragraph 124).

⁸ http://www.naturalengland.org.uk/Images/NEBPU1805Annex2_tcm6-15152.pdf

⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37046/1938-overarching-nps-for-energy-en1.pdf

¹⁰ Sections 16 and 66, Planning (Listed Buildings and Conservation Areas) Act 1990

¹¹ NPPF Section 12 – Conserving and Enhancing the Historic Environment.

¹² http://www.english-heritage.org.uk/upload/pdf/Historic_Environment_Planning_Practice_Guide.pdf?1269365073

12. A 'Heritage asset' is defined in Annex 2 of the **National Planning Policy Framework** as *"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)"*. In view of the number, scale, quality and distribution of designated and undesignated historic features in the Chilterns AONB, the Board considers that significant parts of the AONB can be considered as heritage assets under this definition.

13. Local Planning

14. The Board considers policy CS17 (Environmental Assets) in the **Wycombe Development Framework Core Strategy**¹³ is an example of good practice. The policy includes the text:

"The Council will conserve and improve the environmental assets of the District by requiring:

1. The conservation and enhancement of the Chilterns Area of Outstanding Natural Beauty and its setting".

15. The Board also considers that the first part of policy CS22 (Chilterns Area of Outstanding Natural Beauty) in the **Core Strategy for Chiltern District**¹⁴ is another example of good practice. The policy includes the text:

"The principles to be followed in the Chilterns AONB are that:

a) all proposals must conserve and enhance the special landscape character, heritage, distinctiveness of the Chilterns AONB

b) all proposals must protect the setting of the AONB and safeguard views into and out of the area".

¹³ <http://www.wycombe.gov.uk/council-services/planning-and-building/planning-policy/core-strategy.aspx>

¹⁴ <http://www.chiltern.gov.uk/corestrategy/site/index.php>

Appeal decisions

1. Consideration was given to the impacts on the setting and enjoyment of the **Chilterns AONB** in a joint appeal against the refusal of applications for the redevelopment of a football ground in Marlow for housing development and the creation of a **new football ground** at an alternative site near Little Marlow (see APP/K0425/A/09/2111436, 2010). In dismissing the appeal the Inspector wrote:

“The Chilterns AONB lies to the north on the opposite side of the road to the appeal site and the proposal would not have a direct impact on any of the key characteristics of the AONB landscape. However, the valley floor landscape plays a role in the setting of the AONB. It forms the middle ground of the public view point from Winter Hill on the south side of the river. Whilst it was suggested that the proposal was not on the ‘principal viewline’ across the valley, the Winter Hill view point provides a very wide panorama that is experienced by turning the head to appreciate its breadth. I do not, therefore, consider that there is a ‘principal viewline’. Although the facilities would be sited on lower land to the east of the site close to an existing hedgerow and tree belt they would, in my view, add to the built form in the valley and reinforce the urban fringe character further reducing the integrity of the landscape to the detriment of the open rural character of fields and lakes”.

“The pitches would be mostly used in the winter when floodlights would be needed in the evenings. At night from Winter Hill the sharp line of the lights on the A404 and Marlow beyond contrast with the almost complete darkness of the AONB on the far side of the valley. Whilst there are some lights towards the skyline they are towards the left side of the view where the road climbs the hill. There are sporadic lights on the valley floor but in my view the floodlit training area and the lighting associated with the car park and access would have a dramatic detrimental impact on the night view from Winter Hill”.

“In longer views from the AONB looking south the proposed facilities would be seen in the distance in the valley bottom and would again have a slight detrimental impact by reinforcing the encroachment of urban forms into the predominantly rural open landscape. The same effect, but with greater impact, would be seen at closer quarters by those passing along the A4155. The widened access would have a more urban appearance and the facilities would be seen through the existing boundary trees”.

2. The potential for development to impact on the setting of the **Dorset AONB**, and hence being a material matter in the consideration of the acceptability of a development, has been affirmed by the Planning Inspectorate in connection with an appeal against the refusal of permission for the creation of a new **static caravan community** of 30 bases and a reduction of 30 bases elsewhere on the park (see APP/P1235/A/06/2012807, 2007). The Inspector

wrote:

“I consider that the area immediately abutting an AONB will be relevant where the appreciation of the natural beauty of the designated area may be affected by what lies outside it. In my view, this is analogous to development outside of a Green Belt, where Planning Policy Guidance Green Belts (PPG2) advises, at paragraph 3.15, that the visual amenities of the Green Belt should not be injured by proposals for development conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reason of their siting, materials or design. I therefore agree with the Council that the effect on the AONB is a material consideration”.

3. Further consideration was given to the issue of setting of the **Dorset AONB** by the Inspector in appeal ref APP/P1235/A/08/2072794, 2008 where he stated, with respect to a proposal for the **change of use of land from existing touring caravan site to site for 45 static holiday caravans**, that:

“However, given that the Secretary of State has now published the Proposed Changes to the Draft South West Regional Spatial Strategy (RSS), I attach significant weight to RSS Policy ENV3, which requires particular care to be taken to ensure that no development is permitted outside AONBs which would damage their natural beauty, special character and special qualities – in other words to their setting”.

4. Detailed consideration of the adverse impacts of the construction and operation of a **four 100m turbine wind farm** for electricity generation on the special qualities of **Exmoor National Park** was given by the Inspector in appeal ref APP/Y1138/A/08/2084526, 2008:

“I turn now to views south from Exmoor, and the setting on the National Park. Although it was suggested that the evidence presented in opposition to the proposal was tantamount to the creation of a buffer zone to the south of Exmoor, I accept that this is not the case. The special qualities of Exmoor include the description of ‘a landscape that provides inspiration and enjoyment to visitors and residents alike’. In my judgment part of the enjoyment stems from the appreciation of Exmoor in its rural setting, and the land to the south is a significant element in that. The National Park clearly has a setting framed by the land to the south, and proposals must be considered individually or cumulatively in respect of the setting. The definition of setting is difficult to pin down in many instances. For a particular building it might involve hard boundaries such as walls, but for a landscape it involves concepts such as topography, land use, character, vegetation and more”.

“So the effect on the character and appearance of the area, and the setting of Exmoor, can be summarised thus. The visual experience will vary from location to location, and will be of a major and substantial intrusion in places. There would be serious harm to landscape character. But from some places there would be levels of visibility and intrusion which

would not, in my judgment, be so harmful as to weigh against the proposal. I consider that the skyline views and movement of blades would, notwithstanding the separation from Exmoor, impinge upon the appreciation of the special qualities of Exmoor to a material degree”.

5. An Inspector, in dismissing appeal ref: APP/H1840/A/06/2023564, addressed the issue of the proposed development of a **haulage depot and storage buildings** outside the AONB that impacted adversely on views out from the **Cotswolds AONB**:

“From the elevated vantage point of the Cotswold Way [within the AONB] the greater density of the development would be readily apparent, as although the site forms part of a vast panorama, it would be towards the front of that view”.

6. And towards the Cotswolds AONB:

“From lower viewpoints ... the breach of the AONB skyline would not be mitigated”.

APPENDIX C

Special qualities of the Chilterns AONB¹⁵

- The steep chalk escarpment
- Open, flower-rich, chalk downland
- Large tracts of beech woodland
- Areas of common land
- Locally distinctive flint and brick architecture
- A rich historic environment with many grand houses, designed landscapes, ancient routes, hill forts and chalk figures
- Extensive public rights of way network, including the Ridgeway and the Thames Path National Trails, and other accessible sites which receive 55 million leisure visits a year
- Natural features such as chalk rivers and streams which are a globally scarce habitat supporting a range of specialised wildlife including the water vole
- Tranquillity
- Arable and livestock farms managed with consideration for biodiversity, particularly farmland birds and other wildlife

¹⁵ As detailed in the vision for the Chilterns AONB and introduction to the Chilterns AONB Management Plan 2014-2019: A Framework For Action

Appendix 7 Extracts from Landscape Capacity Assessment, 2017

Chiltern District Council and South Bucks District Council

Landscape Capacity Assessment
for
Green Belt Development Options in the emerging
Chiltern and South Bucks Local Plan

November 2017



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SECTION A

1. Introduction

- 1.1 Chiltern District Council and South Bucks District Council are in the process of producing a Joint Local Plan covering the period up to 2036. Initial work on the Local Plan has come to the view that the joint councils Objectively Assessed Housing Needs for the plan period cannot be accommodated within the existing built up areas excluded from the Green Belt or on previously developed land (PDL) in the Green Belt. As a result the councils are assessing the capacity of the two districts to accommodate additional growth within their areas and also via the Duty to Co-operate looking to Aylesbury Vale District Council to accommodate some of their unmet development needs. This includes a review of the Green Belt.
- 1.2 The Local Plan has been through an Issues and Options consultation in the spring of 2016 and a further Green Belt Preferred Options consultation between October and December 2016. The Green Belt options consultation followed extensive work on assessing the strength of the Green Belt via two studies, the Buckinghamshire Green Belt Assessment Part 1 and a draft Chiltern and South Bucks Green Belt Assessment Part 2.
- 1.3 The first study assessed the whole Green Belt, across the Buckinghamshire county area, against the purposes of including land in the Green Belt and made recommendations as to some areas which performed less well in Green Belt terms which should be assessed further.
- 1.4 The draft Green Belt Assessment Part 2 assessed the areas recommended via Part 1 and the areas nominated by landowners and developers via a call for sites and from responses to the Issues and Options consultation. From all these sites the Green Belt assessment work identified 15 strategic options which could potentially be released from the Green Belt, subject to other evidence based work. The Green Belt assessment focussed on the Green Belt purposes although some elements of sustainability / development strategy options were applied to areas which passed the initial Green Belt assessment.
- 1.5 This Landscape Capacity Assessment appraises the 15 strategic options in landscape and visual terms and will form part of the Councils' evidence base.
- 1.6 Nationally protected landscape in the form of the Chilterns Area of Outstanding Natural Beauty (AONB) covers 72% of Chiltern District. The proportion of South Bucks District included in the AONB is less at 3%. In Chiltern District, therefore, the Green Belt options being considered for potential removal from the Green Belt are either in the AONB or immediately adjacent to the AONB and some may form part of the setting of the AONB. The setting of the Chilterns AONB is the area outside the AONB but within which proposals, by virtue of their nature, size, scale, siting, materials or design, could be considered to have an impact on the natural beauty and special qualities of the Chilterns AONB.
- 1.7 Full Landscape Visual Impact Assessment (LVIA) would need to inform specific development proposals to establish the potential harm to the wider AONB and countryside generally and to demonstrate that harm can be minimised or mitigated against through scale of development, layout, provision of strategically placed open space, landscaping or built form design constraints.
- 1.8 Section A of this Report sets out the planning context, including AONB, Colne Valley Regional Park and Green Belt policies and guidance, description of the landscape character framework and explanation of the assessment methodology used. Section B comprises appendices as follows:

Appendix 1 contains mapping of the study area, showing the location of each option site with relevant policy boundaries, landscape character and landscape features. Appendix 2 is a summary table of capacities, Appendix 3 is a glossary, Appendix 4 is a description of landscape buffers and Appendix 5 is a bibliography.

- 1.9 Individual reports detailing each site's assessment (with supporting photographs and mapping), and record sheets, containing detailed notes from fieldwork, are available as separate files. Any additional option sites which come forward following the publication of this main report in October 2017 will be assessed using the same methodology unless otherwise stated and files containing reports and record sheets will be added to the website.
- 1.10 This report is prepared by The terra firma Consultancy Ltd. It is based on fieldwork and a desk-top review of primary baseline documents: the Emerging Chiltern and South Bucks Local Plan (2014-2036), the Chiltern District Core Strategy (2011), the South Bucks Core Strategy (2011) and supporting documents; Chilterns AONB Management Plan (2014-2019); Chilterns Landscape Character Assessment (2011), South Bucks Landscape Character Assessment (2011); OS mapping; and GIS environmental constraints mapping from the councils.

2. Planning context

2.1 Brief summary of adopted and emerging policies and guidance and policy in relation to settlement expansion in the study area:

2.2 The Chiltern District Core Strategy 2011 and adopted Local Plan 1997 include a number of policies which are relevant:

- **Policy CS 13: Major developed site within the Green Belt at the National Society for Epilepsy, Chalfont St Peter** – any development should ensure no greater impact on the openness of the Green Belt.
- **Policy CS22: Chilterns Area of Outstanding Natural Beauty** aims to protect the AONB and promote its aims.
- **Policy CS32: Green infrastructure** – Existing assets as identified in the Buckinghamshire Green Infrastructure Strategy (2009), will be protected and new GI sought.
- **Policy GB2: Development in General in the Green Belt** –there is an assumption against development in the Green Belt with a few exceptions which are set out.

2.3 The South Bucks Core Strategy 2011 includes a number of policies which are relevant:

- **Policy CP8: Built and Historic Environment** aims to protect the district's historic environment.
- **Policy CP9: Natural Environment** gives the highest priority to conserving and enhancing the Chilterns AONB
- **Core policy 14 Wilton Park major developed site in the Green Belt**
- **Core Policy 16 South of Iver** – redevelopment of existing employment uses to reduce HGV movements

7. Methodology

Reporting units

- 7.1 The published landscape character assessments identify landscape areas within the study area. In the first instance the field surveys confirmed that the 2011 landscape character areas generally reflected physical and visual characteristics of the landscape. As a result these landscape character areas have been incorporated into the Study.
- 7.2 All of the site options lie wholly within one local landscape character area and in most cases one report has been produced for the whole of the site. However, for the largest site (option 9) where the site's character is significantly different in one area than another the area has been subdivided into 5 sub-areas.

Basis of methodology

- 7.3 The methodology and assessment criteria used for this assessment are detailed below. Sources of data are identified in Appendix 4 of this Report. The key texts on which methodology is based are the Scottish Natural Heritage and The Countryside Agency's *Landscape Character Assessment* (2002) and subsequent *Topic Paper 6 Techniques and Criteria for Judging Capacity and Sensitivity* (2006) as well as the Landscape Institute / IEMA *Guidelines for Landscape and Visual Impact Assessment* (2013) (GLVIA).
- 7.4 As in current best practice, sensitivity should be assessed against a specific change, and for this study, a development scenario based on nominal densities ranging from 30-40 residential dwellings per hectare (as set out in the Councils' Preferred Options) including the provision of open space serving the development, with dwellings of two or three storeys, has been assumed for each site as a guide against which sensitivity has been assessed.
- 7.5 Best practice guidance also recognises that a landscape with a high sensitivity does not automatically mean that landscape has a low capacity for change, but that 'capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued' (*Topic Paper 6, 2006, p12*). The sites have been assessed with the development scenario above in mind. Recommendations and comments have been added regarding the appropriate development of particular sites and to ensure raised awareness of potential unacceptable adverse effects on landscape character.
- 7.6 Proposals for any development would need to include appropriate, detailed and specialist input into siting, layout and design, and a full landscape and visual impact assessment should accompany a specific planning application relating to any site. Other studies including ecology, archaeology, arboriculture, traffic, soils may also be required to accompany specific proposals.
- 7.7 Details of the landscape and visual attributes for each site and an assessment of landscape and visual sensitivity (based on desk top studies and field surveys) are to be found on the Record Sheets in Appendix 2. A summary of the landscape sensitivity, value and capacity for each site, or sub-areas of each site, follows in individual Reports.

Assessment process

- 7.8 The assessment methodology is a staged process. Landscape attributes (Table 3), and visual attributes (Table 4), are considered separately in accordance with the guidance in GLVIA. These attributes are used to identify the **intrinsic landscape and visual sensitivity** (Stages 1 and 2) of the site, or its sub-areas, on a scale of 5 levels from low to high as set out under the Matrix 1 and 2 below. Then the landscape and visual sensitivity of the site, or its sub-area, are merged to identify the **landscape character sensitivity** (Stage 3) as set out under Matrix 3 below.
- 7.9 The Study goes on to classify the **sensitivity of the site in its wider context** (Stage 4) into five categories. Then in Stage 5 the landscape character sensitivity is combined with the wider sensitivity as set out in Matrix 4 to identify the **overall landscape sensitivity** (Stage 5).
- 7.10 The **landscape value** (Stage 6) of each site, or sub-area, is assessed separately on a scale of 5 levels as set out under Table 5 below. Finally the overall landscape character sensitivity is merged with the landscape value on a scale of 5 levels to give an assessment of **landscape capacity** (Stage 7) also on a scale of 5 levels as set out under Matrix 5 below. This 'bottom up' process is tested against the five criteria for landscape capacity (Stage 7) based on professional judgement and an overall full understanding of the sites.

Assessment abbreviations and colour code:

 L	– Low Capacity	 M/L	– Medium / Low Capacity	 M	– Medium Capacity
 M/H	– Medium / High Capacity	 H	– High Capacity		

Stage 1: Determination of Visual Sensitivity

- 7.11 This assessment is set out in the Record Sheets and Reports for each site, or sub-division.
- 7.12 The assessment considers the types of **views (e.g panoramic, distant, context)**, the nature of the **viewers** and the **potential to mitigate** visual impact on the identified viewpoints. The more viewpoints, the more exposed the site, the greater the sensitivity of the viewers (based on GLVIA) and the greater difficulties in screen planting to mitigate the impact without harm to the landscape and visual attributes of the site, the higher the sensitivity. As a final test all the sites were reviewed to assess the relative visual sensitivity of the sites and ensure that professional judgements have been consistent along the way. At this stage each level has been given a score from low = 1 to high = 5 and the scores are added up. Total scores for the site, or sub areas, are grouped as shown.

Matrix 1: Visual sensitivity

General visibility	L (1)	L/M (2)	M (3)	M/H (4)	H (5)
Population	L (1)	L/M (2)	M (3)	M/H (4)	H (5)
Mitigation	L (1)	M/L (2)	M (3)	M/H (4)	H (5)
OVERALL VISUAL SENSITIVITY	3-4 = low; 5- 7 = Med/low; 8-10 = Med; 11-13 = Med/high; 14-15 = High				

Table 3: Notes on Visual Sensitivity Assessment

Factor	Higher sensitivity	Lower sensitivity
General Visibility	Sequenced and exposed views toward site	Fleeting and limited views
	Most of site area visible	Little of site area visible
	Site is a key focus in available wider views	Site is an incidental part of wider views
	Site includes prominent and key landmarks	No landmarks present
	Important vistas or panoramas in/out of area	Unimportant or no vistas
Population	Prominent skyline	Not part of skyline
	Large extent or range of key sensitive receptors	Lack of sensitive receptors
	Large number of people see site	Few can see site
	Key view from a sensitive receptor	Views of site are unimportant
	Site is part of valued view	Site does not form a part of a valued view
Mitigation	Site in key views to/across/out of town	Not part of setting of settlement view
	Mitigation not very feasible	Mitigation possible
	Mitigation would interrupt key views	Would not obscure key views
	Mitigation would damage local character	Mitigation would not harm local character

Stage 2: Determination of Landscape Sensitivity

- 7.13 This assessment is set out in the Record Sheets and Reports for each site or sub-division.
- 7.14 The assessment considers the **natural** physical factors which make up the landscape character of the site, the **cultural** and built form aspects and the **perceptual** features. The greater the incidence of landscape interest and diversity, historically important features and cultural associations, and the greater the levels of access and perceptions of tranquillity and strong landscape pattern, the greater the sensitivity. As a final test all the sites were reviewed to assess the relative landscape sensitivity of the sites and ensure that professional judgements have been consistent along the way. At this stage each level has been given a score from low = 1 to high = 5 and the scores are added up. Total scores for the site, or sub areas, are grouped as shown.

Matrix 2: Landscape sensitivity

Natural factors	L (1)	L/M (2)	M (3)	M/H (4)	H (5)
Cultural factors	L (1)	L/M (2)	M (3)	M/H (4)	H (5)
Perceptual features	L (1)	M/L (2)	M (3)	M/H (4)	H (5)
OVERALL LANDSCAPE SENSITIVITY	3-4 = low; 5- 7 = Med/low; 8-10 = Med; 11-13 = Med/high; 14-15 = High				

Table 4: Notes on Landscape Sensitivity Assessment

Factor	Higher sensitivity	Lower sensitivity
Natural	Native woodland	Plantation
	Significant tree/groups	Insignificant/young trees
	Strong hedgerow structure with hedgerow trees	Weak structure and no trees
	Species rich grassland	Arable field
	Significant water feature(s)	No water feature(s)
	Varied landform and distinctive feature of the area	Uniform landform and lack of topographical features
	Pronounced Geology	Lack of geological features
	Soils significantly contribute to landscape features	Soils are not an important feature
	Complex and vulnerable landcover	Simple robust landcover
	Presence of other significant vegetation cover	Absence of other significant vegetation
	Presence of valued wildlife habitats	Absence of valued wildlife habitats
	Significant wetland habitats and meadows	Poor water logged areas
	Presence of common land	No common land
	Presence of good heathland	Lost heathland
Cultural	Distinctive good quality boundary features	Generic or poor boundary features
	Evidence of surviving part of an historic landscape	No evidence
	Complex historic landscape pattern with good time depth	Simple modern landscape
	Evidence of historic park	No evidence
	Important to setting or in a Conservation Area	No relationship
	Includes a Scheduled Ancient Monument or Important to setting	No relationship
	Locally distinctive built form and pattern	Generic built form
	Important to setting of a Listed building	No relationship
	Distinctive strong settlement pattern	Generic or eroded pattern
	Locally significant private gardens	Poorly maintained gardens erode the character
	Evidence of visible social cultural associations	Lack of social cultural associations
Perceptual	Quiet area	Noisy area
	Absence of intrusive elements	Intrusive elements present
	Dark skies	High levels of light pollution
	Open exposed landscape	Enclosed visually contained landscape
	Unified landscape with strong landscape pattern	Fragmented/'bitty' or featureless landscape
	Well used area or appreciated by the public	Inaccessible by public
	Important rights of way	None present
	Well used and valued open air recreational facilities	None present

	Open access land	None present
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Stage 3: Determination of Landscape Character Sensitivity

7.15 The landscape sensitivity and visual sensitivity are combined, as shown in Matrix 3, to give the **landscape character sensitivity**. The results of the assessment are set out in the Reports for each site or sub-division.

Matrix 3: Landscape character sensitivity

VISUAL SENSITIVITY	High	M	M/H	M/H	H	H
	Med/High	M/L	M	M/H	M/H	H
	Medium	M/L	M/L	M	M/H	M/H
	Med/Low	L	M/L	M/L	M	M/H
	Low	L	L	M/L	M/L	M
	Low	Med/Low	Medium	Med/High	High	
LANDSCAPE SENSITIVITY						

Stage 4: Determination of Wider Sensitivity – The Contribution of the Site to the Wider Landscape and Settlement Edge Pattern

7.16 Stages 1 to 3 have led to a comprehensive assessment of the intrinsic landscape sensitivity of the individual sites. However the sensitivity of each site to development is also affected by its importance, and contribution, to the adjacent wider rural landscape and the influence of, and pattern of uses within, the settlement edge. The relative wider sensitivity of each site is assessed as follows:

Low wider sensitivity – The site is heavily influenced by the built form of the adjacent urban settlement and not an important part of the adjacent wider landscape

Medium/Low wider sensitivity – The site is heavily influenced by urban fringe uses and has views of the some parts of the adjacent urban settlement but shares some of the characteristics of the adjacent wider landscape

Medium wider sensitivity – The site is partly influenced by urban fringe uses but shares many of the characteristics of the wider landscape, with good physical and visual links to the wider landscape

Medium/High wider sensitivity – The site has strong physical and visual links to the wider landscape and these outweigh any minor impacts from the adjacent urban settlement

High wider sensitivity – The site is an important part of the wider landscape with which it has strong visual and landscape links. The nearby settlement has little impact on the site.

7.17 The results of the assessment are set out in the reports for each site or sub-division.

Stage 5: Determination of Overall Landscape Sensitivity

7.18 The **overall landscape sensitivity** is determined by combining the landscape character sensitivity with the wider sensitivity as shown in Matrix 4. The results of the assessment are set out in the Report Sheets for each site or sub-division.

Matrix 4: Overall landscape sensitivity

LANDSCAPE CHARACTER SENSITIVITY	High	H	H	M/H	M/H	M
	Med/High	H	M/H	M/H	M	M/L
	Medium	M/H	M/H	M	M/L	M/L
	Med/Low	M/H	M	M	M/L	M/L
	Low	M	M	M/L	M/L	L
	High	Med/High	Medium	Med/Low	Low	
	WIDER SENSITIVITY					

Stage 6: Determination of Landscape Value

7.19 The model for this work follows GLVIA 2013.

Table 5 - LANDSCAPE VALUE CRITERIA

Value	Typical criteria	Typical scale	Typical examples
High	Very High importance (or quality) and rarity. No or limited potential for substitution	International	World Heritage Site SAC
Medium/high	High importance (or quality) and rarity. Limited potential for substitution	National	National Park/ AONB SSSI EH Register of Parks and Gardens Grade I and II* listed buildings and their settings National recreational route or area e.g. Chiltern Way
Medium	Medium importance (or quality) and rarity. Limited potential for substitution	Regional	Setting of AONB / National Park Regional Park (i.e Colne Valley) Local landscape designation Landscape value identified in the Local Plan SINC/Conservation Areas and their setting Grade II listed buildings and their setting Local Wildlife sites Regional recreational route/area e.g South Bucks Way
Medium/low	Local importance (or quality) and rarity. Limited potential for substitution	Local	Undesignated but value expressed through publications such as Village Design Statements Local buildings of historic interest and their settings Local recreational facilities of landscape value
Low	Low importance (or quality) or rarity		Area of little value and identified for improvement

Designations: The location of the site within a designated area, or the presence of a designated area within the site, is an important measure of the value society gives to the landscape of the site. These include landscape, historic and ecological designations and recreational routes at a national/international level, regional or district level, or at the local level.

Local Associations: These are included as far as possible using available data. In addition to the more formal designations above, sites may sometimes have special scenic value, associations or meanings to the local community and therefore make a contribution to the value of the local landscape. This has

been assessed through a review of readily available evidence of community value. Further research may be required as part of any detailed landscape and visual impact assessment.

Stage 7: Determination of Landscape Capacity

7.20 Landscape capacity is the ability, or otherwise, of the sites to accommodate a certain amount of development. The landscape capacity is determined by combining the overall landscape sensitivity with the landscape value as shown in Matrix 5. The results of the assessment are set out in the Report Sheets for each site or sub-division.

Matrix 5 LANDSCAPE CAPACITY

OVERALL LANDSCAPE SENSITIVITY	High	M	M/L	L	L	L
	Med/High	M/H	M	M/L	L	L
	Medium	H	M/H	M	M/L	L
	Med/Low	H	H	M/H	M	M/L
	Low	H	H	H	M/H	M
		Low	Med/Low	Medium	Med/High	High
		LANDSCAPE VALUE				

7.21 The results from the matrix are subsequently tested against the following classifications for each level of landscape capacity, building on classifications used by the authors of this Report for other capacity studies.

Low capacity – The landscape could not accommodate areas of new development without a significant and adverse impact on the landscape character and visual amenity. Occasional, very small scale development may be possible, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas.

Medium / Low capacity – A low amount of development can be accommodated only in limited situations, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas.

Medium capacity - 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.

Medium/ High capacity – The area is able to accommodate larger amounts of development, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas. Certain landscape and visual features in the area may require protection.

High capacity – Much of the area is able to accommodate significant areas of development, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas.

Stage 8: Determination of Landscape Capacity within the Site and Green Infrastructure

- 7.22 Each site report contains an overall plan showing the landscape capacity classification of the site at the beginning of the site report; and, at the end of the site report, an overall plan showing the extent of the site recommended for further consideration as a site, the recommended location and extent of Green Infrastructure to mitigate and protect - based on best practise and the broad principles set out in the Buckinghamshire Green Infrastructure Strategy - and the preferred access point. On sites with existing development the Councils provided advice as to the known intentions of landowners and the potential for previously developed land to be redeveloped. Where relevant, comment has been made in site reports. The capacity figures are to be treated as indicative, and the actual capacity of each site will be determined by more detailed assessment of the site.
- 7.23 Each site is examined in detail to determine the potential area for development in the light of the landscape capacity and landscape and visual constraints on the site. In some cases the whole site will be ruled out for development. In others the whole site will be included as a potential site, subject to the provision of Green Infrastructure. However in many cases we recommend a 'reduced area' which identifies a part of the site that could be considered further as a potential site subject to the provision of Green Infrastructure. The 'reduced area' is that part of the site that could be developed whilst conserving (and potentially in some cases indirectly enhancing) the key landscape and visual characteristics of the site and its landscape setting; and whilst conserving and reinforcing the influence of the underlying landscape on the settlement pattern of the adjacent town or village. The policy constraints affecting sites within the AONB, the Green Belt and the Colne Valley Regional Park have also been taken into account.
- 7.24 For each site recommended to go forward for further consideration, we have indicated the approximate location and extent of proposed landscape mitigation and enhancement. This could include different types of planting and open space which is described in the conclusions and recommendations for each site and may include strategic site Green Infrastructure outside of the development area or reduced development area of each site, in addition to any within the proposed development area. Mitigation and enhancement is designed to retain and enhance key landscape features and link open space into the adjoining Green Infrastructure features. It should be regarded as additional to the provision of open space to serve the needs of the development and future residential amenity. However it should also be integral to the landscape masterplan for these sites and the delivery of Green Infrastructure to serve the existing and future community. Existing vegetation and open space is not shown on diagrams but is described in the reports where relevant.

- 7.25 Where the whole or a part of the site is recommended for further consideration, we have indicated a preferred access point to the site in order to minimise the landscape and visual impact. The location and design of the access must be considered through the landscape and visual impact assessment process to ensure that the highway junction and access in to the site is in keeping with the character of the area and that proper regard is given to the landscape and visual impact of new highway infrastructure on the rural character and settlement edge of the approaches to the larger villages.
- 7.26 The capacity of each site is based on a nominal density of between 30-40 dph for the site or reduced area and excludes the area annotated for Green Infrastructure.
- 7.27 The reports identify the main landscape and visual considerations to be taken into account in the siting and design of any development. The blue hatched areas in the Recommendation Figures are indicative and do not suggest that development would be acceptable right up to the boundary. The precise location of development within the site would be determined by more detailed assessment.
- 7.28 The Study does not include recommendations for the phasing of development. However, if phased development is proposed, phasing should include proposals for the design and implementation of phased landscape provision including adjoining Green Infrastructure, open space, and landscape treatment. This principle also applies if adjoining sites are developed sequentially or consecutively.
- 7.29 **It is important to note that this Study does NOT recommend the development of all the sites considered in the study.** The object of the Study is to identify those sites which have the potential to be more suitable for housing from which the councils can select those sites it wishes to include to meet demand within the Local Plan period based on various elements of technical evidence.
- 7.30 The Study has not assessed the cumulative impact of a number of sites at any one settlement as this is most appropriately undertaken at a later stage in the process. The Study does not recommend any sites where the development of one site would preclude the development of another but in some cases has recommended that one site be developed as an extension to the one adjoining.
- 7.31 Study Constraints
1. The sites have largely been assessed from publicly accessible viewpoints including the local road network, public rights of way, public open space and other publicly owned land. Permission was provided by the owners to visit many of the sites and site visits were undertaken where public views were inadequate to assess the site. Views from private houses and from private land are noted where obvious, but were not visited. This has not resulted in any significant constraint on the assessment.
 2. Site photographs included in this study are representative of key views of the site.
 3. Views from the surrounding countryside or urban areas have been assessed by noting intervisibility from within or adjacent to the site, but the Study does not include an assessment of the potential zone of visual influence of any development on each site.
 4. The majority of study fieldwork was undertaken in June 2017 with summer vegetation.
 5. Nominal densities between 30-40 dph have been applied. These densities were set out by the councils in their Preferred Options document.

Site 6: Area south-east of Little Chalfont

Site map:



Figure 6.1 Landscape capacity and location of photographic viewpoints

Chiltern District Landscape Character Assessment

Site 6 lies within LCT18 Rolling Farmland; LCA 18.3 Little Chalfont Rolling Farmland for which the key requirements are set out below:

Strategy / Vision for the wider LCA: conserve and enhance the woodland, farmland and historic parkland which is retained between settlements and which contributes to the rural, peaceful character:

Guidelines (of relevance to this site, from the wider LCA):

- 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.
- 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.

Site description:

Site 6 comprises a large area on the eastern side of Little Chalfont. Lodge Lane forms the eastern boundary, beyond which is the AONB. The railway line forms the northern boundary, and the private road, Long Walk forming much of the south-eastern, with rear gardens of properties on Long Walk forming the rest. Burtons Lane forms the south-western boundary with rear gardens forming the western. The north part of site is a former golf course accessed off of Lodge Lane, with a clubhouse converted for residential use near the site entrance. Woodland and tree belts (including two areas of ancient woodland) enclose the open northern area in the centre of the site and a small industrial park is set within the woodland, accessed off of Lodge Lane. Private houses in large gardens with paddocks and woodland, accessed off of Burtons Lane, form the western part of site. The south-eastern area contains paddocks.

Key landscape planning factors:

The site lies within the Green Belt and adjacent to and within the setting of the Chiltern Hills AONB.

Photographs:



Photo 1: View south-east across private gardens / paddocks in western part of site. Open grass valley enclosed by woodland in right of photo, is typical of the wider character. The house and cluster of associated buildings are set on the higher ground, behind vegetation to the left of the photo.



Photo 2: House and cluster of associated buildings in the western part of site (currently under redevelopment) are set on the higher ground above the open valley (see photo 1)..



Photo 3: View east along the northern boundary of the former golf course. The railway line is to the left with the boundary formed in part by a tall conifer tree belt with some gaps.



Photo 4: View north-west from within former golf course. The settlement is edged in vegetation but some buildings visible.



Photo 5: View south-west within former golf course along edge of ancient woodland.



Photo 6: Former golf clubhouse building in north-eastern corner. Access onto Lodge Lane is just behind the building, with the boundary heavily treed and with the AONB beyond. The area of ancient woodland runs to the right and the industrial estate is beyond it.



Photo 7: View north-east within former golf course. The area has a gently rolling topography, is currently cut seasonally for hay and contains a number of semi-mature specimen trees.



Photo 8: View from Lodge Lane into industrial estate which is set within woodland.



Photo 9: View from Long Walk across paddock in south-east corner. Woodland to the left has the industrial estate within it. Woodland to the right is across Lodge Lane, within the AONB. The fence is along Lodge Lane, with open views into site.



Photo 10: View from Long Walk, across meadow in south of site, down dry valley with woodland beyond.



Photo 11: View north-east along Long Walk, with site on left and houses on right.



Photo 12: North-east field visible through gaps in hedgerow.

Please refer to section 3 methodology of the assessment process

1. Visual Sensitivity: Low

- Much of site not widely visible due to woodland cover and topography
- South-eastern field visible through gaps in hedge from Lodge Lane
- No known intervisibility with wider AONB – some views from edge only
- Mitigating planting could be appropriate to the character

2. Landscape Sensitivity: Medium

- 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 – a special quality of the adjacent AONB
- Varied land use, including residential, former golf course and industrial estate

- Two areas of ancient woodland and other woodland areas
- Tree belts to some boundaries
- No known cultural sensitivities
- Tranquillity affected by trains and industrial site
- No public access to site
- Complex and irregular landscape pattern

3. Landscape Character Sensitivity: Medium / Low (combines 1 and 2)

4. **Wider Landscape Sensitivity: Medium**

- Surrounded by dense settlement to north and north-west and less dense settlement to south
- Edge of settlement largely well vegetated, although Long Walk edge partly open
- Site has some connection to the settlement
- Parts of site north and south of dry valley are at a similar elevation to surrounding settlement
- Landform and woodland / farmland mosaic is largely typical of wider character with links to landscape and AONB to east
- Garden areas, industrial areas and flat paddocks less representative

5. Overall Landscape Sensitivity: Medium (combines 3 and 4)

6. **Landscape Value: Medium**

- Adjacent to boundary and within setting of AONB

7. Landscape Capacity: Medium (combines 5 and 6)

Relationship of site to Little Chalfont

- Adjacent to dense settlement on northern and north-western sides
- Southern part of site adjacent to less densely settled part of town
- Edge of settlement largely well vegetated, except Long Walk edge which is partly open, and parts of northern and north-eastern site feel remote from settlement
- Parts of site north and south of dry valley are at a similar elevation to surrounding settlement

Relationship with adjacent wider countryside

- Much of site is typical of wider character and north-eastern part has links to landscape to east
- House curtilages, horse paddocks and industrial estate are less similar in character to the wider landscape

Potential impact on key landscape characteristics

- Loss of natural topography
- Loss of or harm to woodland, including ancient woodland blocks
- Loss of tree belts
- Further erosion of tranquillity
- Enhanced public access and links to AONB from settlement
- Loss of landscape pattern

Potential impact on key visual characteristics

- Impact on views at edge of AONB

Potential impact on key settlement characteristics

- Extension of dense settlement to east of village and intensification of development close to loosely developed south-eastern part of the village
- Extension of settlement beyond characteristic elevation into dry valley

Potential impact on the setting of the AONB

- Limited views from edge of AONB into parts of eastern area of site
- Protection of special qualities – woodland / farmland mosaic and folding topography

Landscape mitigation and contribution to green infrastructure

- Introduction of public access into area including links between settlement and AONB and possibly to reinstate pedestrian access over disused railway bridge to north
- Long-term management of woodland, including ancient woodland blocks
- Create new woodland links between woodlands
- Replacement of exotic species in former golf course, particularly along northern edge
- New planting to industrial estate entrance and along Lodge Lane to enhance views from Lodge Lane and the edge of the AONB

Conclusion and recommendations

- 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.
- Within these constraints, and subject to the recommendations set out below, much of the higher ground within the former golf course could be developed, leaving the lower dry valleys undeveloped as distinctive landforms and buffer to protect the areas of ancient woodland. An area of development could be accommodated on higher ground to the south-east of properties on Loudhams Wood Lane, within the curtilage of the existing residential property (which is being redeveloped at the time fieldwork was undertaken). A further area of development could be accommodated in the south-east, leaving the dry valley open. The industrial estate has capacity to take intensified development, subject to the protection of the woodland setting and adjacent ancient woodland and the protection of the rural character of Lodge Lane.
- Recommended mitigation and enhancement is a combination of native woodland planting along the margins of adjacent woodland blocks, graded down to native shrubs and long grass margins, leaving the dry valleys as open grassland managed for wildlife and public access, including links between the settlement and the AONB, and contributing to the wider green infrastructure as well as above recommendations. In the south-eastern part of the site development offers the opportunity to soften the edge of settlement with new woodland planting linked to existing woodland. Take into account the possibility of the existence of parcels of traditional orchards and restore and extend in line with the AONB's Chalk, Cherries and Chairs project.
- Vehicular access to the northern part of site could be from Loudhams Wood Lane, or via the existing golf course entrance on Lodge Lane as shown on figure 6.2 below. The former is likely to be constrained by the limited capacity of Loudhams Wood Lane and the former should be limited by and designed to enhance and cause no harm to the rural character of Lodge Lane. Alternatives should be explored to consider routing of vehicular access across the site from Burtons Lane to the west, while avoiding harm to woodland and respecting the valley topography. Access to the industrial estate should be via the existing entrance on Lodge Lane, although options should be considered to route the vehicular access across the site from Burtons Lane to the west so that the Lodge Lane entrance could be closed. This would need to avoid harm to the woodland, including the ancient woodland and respect the distinct landform. Any access points off of Lodge Lane have the potential to enhance the rural character, which is affected by the existing golf course and industrial estate accesses. The area in the south-east of the site should only be developed if a modest and sensitive vehicular access can be incorporated and that the rural character of Lodge Lane and that the AONB can be protected.
- A density range of between 30-35 dph is proposed by the Council across the site and at this density a range of between 547-638 dwellings might be accommodated. Lower density housing should be located on the eastern side of the site towards the AONB.
- Detailed landscape and visual assessment will be essential to inform the final capacity of the site in landscape terms.
- Compensatory landscape improvements to the remaining surrounding Green Belt land should take into account the guidelines of the Chiltern District Landscape Character Assessment and objectives of the Chilterns AONB to conserve and enhance its natural beauty and setting. Opportunities for enhancements include managing woodland, hedgerows, farmland for their landscape and biodiversity value and restoring orchards and pre 18th century field enclosures. Other improvements could include enhancing accessibility from Little Chalfont and nearby settlements to the surrounding countryside and AONB whilst maintaining local character and biodiversity interest. Improvements and provision of green infrastructure where landscapes can provide multiple benefits including enhancing landscape character, providing opportunities for recreation and storage of carbon and water should also be explored.

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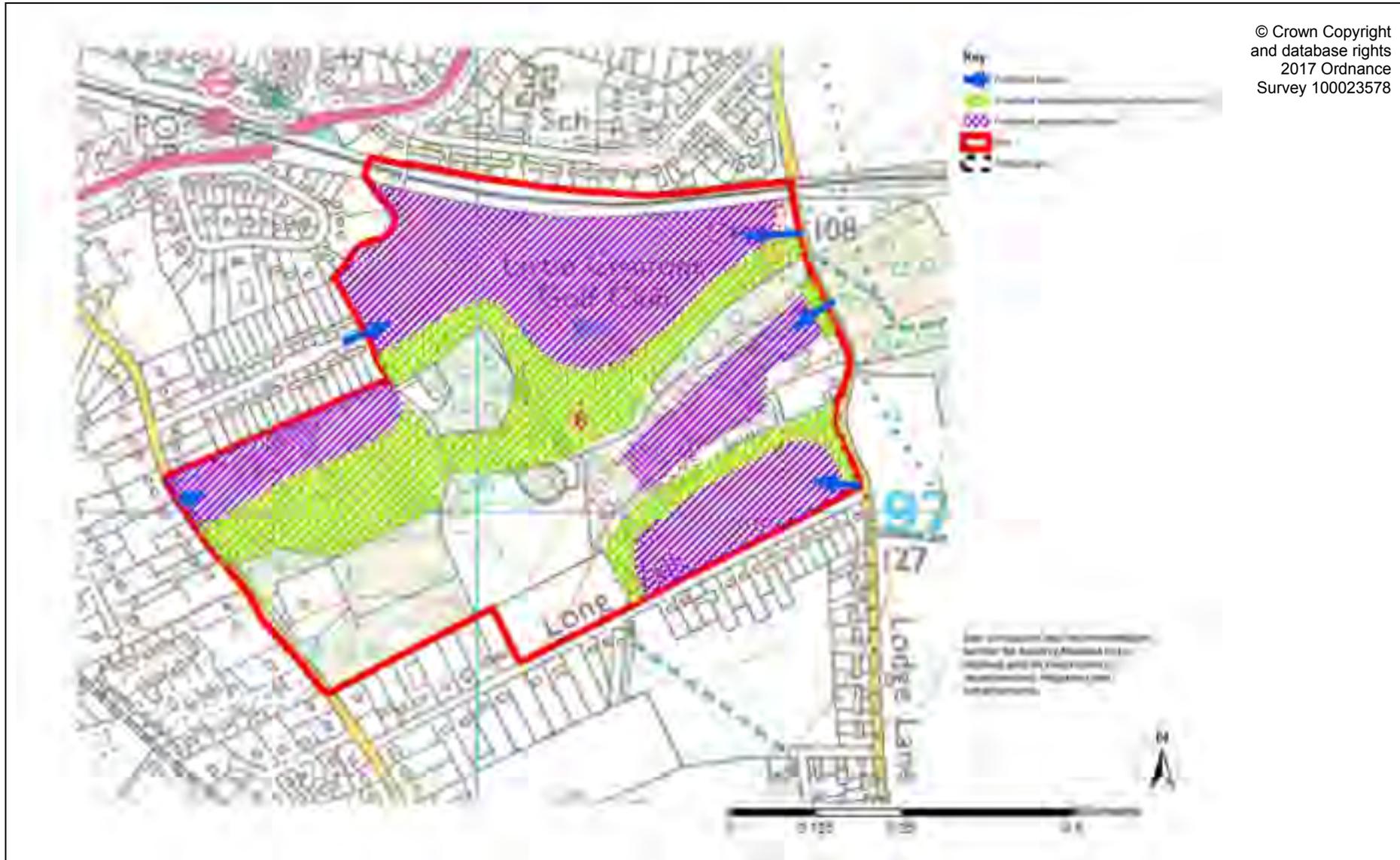


Figure 6.2: Recommended development area and landscape mitigation and enhancement

CHILTERN AND SOUTH BUCKS DISTRICT COUNCIL CAPACITY STUDY 2017 RECORD SHEET

Site:	Site 6: Area south-east of Little Chalfont
Site character areas:	None
Date of site survey:	21.6.17
Surveyors:	AG / IDT
Weather/visibility:	Fine / clear
LCA Key characteristics:	LCT 18 Rolling Farmland; LCA 18.3 Little Chalfont Rolling Farmland <ul style="list-style-type: none"> • Small winding rural roads and lanes with little traffic and an intimate character. A small number of footpaths, offering recreational access to woodland • Sweeping topography and farmland land cover with limited settlement contributes to a well balanced and uniform landscape. • 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. • Arable farmland often occupies large extended fields with extensive boundary loss. Elsewhere, 20th century and pre 18th century irregular enclosures exist. • Stretches of roads through farmland and woodland which retain a rural character. The busy A404 (Amersham Road) and railway line cut through 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.
LCA Landscape and visual sensitivities:	<ul style="list-style-type: none"> • 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. • Long views across open sweeping farmland in the north to wooded backdrops, often to a distant wooded backdrop. • Stretches lanes/roads through open farmland or enclosed by woodland which retain a rural character. • Small fields of pre 18th century irregular enclosures. • Earthwork enclosures and barrows occur in woodland providing archaeological interest
Landscape designations:	Adjacent to Chiltern Hills AONB

VISUAL SENSITIVITY

<i>General visibility</i>	<i>Population</i>	<i>Mitigation potential</i>
<p>Views into the site from: Glimpsed views into north-eastern part from Lodge Lane and from trains and houses South-eastern parts visible from Lodge Lane through gaps in hedgerow Views from Long Walk more open</p>	<p>Types of viewers: Motorists Train travellers Residents</p>	<p>Opportunities for mitigation and landscape compatibility of mitigation: Good structure of woodland, hedgerows and individual trees to build upon</p>
<p>Views out of the site to: Mostly enclosed by woodland, but glimpses of houses to north and north-west</p>	<p>Magnitude of viewers (level of use and popularity): Quiet roads, including Long Walk which is a private road Few houses Frequent trains</p>	<p>Impacts of mitigation: Sensitive planting would be appropriate to the character</p>
<p>Does the site form part of a skyline? High ground within the site forms skyline when viewed from low ground within the site</p>	<p>Visual perceptions (activity and expectations of local visual receptors): People travelling past by train are viewing countryside adjacent to the AONB but are travelling at speed and are unable to fully take in the detail of the landscape Residents sensitive Lodge Lane is at the edge of the AONB and has a rural character, although affected by views of houses on Long Walk and edge of industrial estate</p>	
<p>Panoramic views: No</p>		
<p>Landmark features: None</p>		
<p>Sensitivity score: Low</p>	<p>Sensitivity score: Medium / Low</p>	<p>Sensitivity score: Low</p>
<p>Visual sensitivity score: Low</p>		
<p>Additional comments:</p>		

LANDSCAPE SENSITIVITY

<i>Natural factors</i>	<i>Cultural factors</i>	<i>Perceptual features</i>
<p>Topography and landform: Gently rolling dry valleys, the main one running south-west to north-east, with another in the centre of the southern boundary, dropping northwards. High ground is in the northern central and south-eastern parts of site. Some localised artificial landform associated with former quarry in centre of site, former golf course and clubhouse, houses in south-west, and industrial park</p>	<p>Boundary features other than vegetation: Post and wire Post and rail</p>	<p>Tranquillity – Noise levels: Trains intermittently – affecting northern area Noise from industrial estate during working hours Traffic on Lodge Lane affecting eastern side of site</p>
<p>Geological features: Small former quarry in centre of site</p>	<p>Historic landscapes: None known</p>	<p>Tranquillity – Visual intrusion / detractors: Trains – affecting northern area Fencing to railway line Industrial estate Horsiculture in south-east Partly demolished golf clubhouse and materials storage / dumping</p>
<p>Soil quality: Grade 3</p>	<p>Parkland features: None known</p>	<p>Tranquillity – Light pollution/dark skies: Trains intermittently – affecting northern area Glow from town Security lighting in industrial park Otherwise generally dark</p>
<p>Water features: None known</p>		
<p>Landcover and land use: Former golf course in north Industrial estate in centre / east Paddocks / horsiculture in south-east and west Houses and gardens in east and one just south of industrial estate</p>	<p>Conservation Area: None</p>	

<i>Natural factors</i>	<i>Cultural factors</i>	<i>Perceptual features</i>
<p>Tree belts, individual trees and riverside trees: Conifer belt along much of northern boundary with railway line Tree belt along Long Walk and part of Lodge Lane in north-east corner Trees belt along much of western boundary with adjacent housing Individual trees scattered across former golf course, in south-east and around house in west</p>	<p>Landscape features of CA: N/A</p>	
<p>Hedgerows and hedgerow trees: Hedgerow to south-eastern edge, along Lodge Lane</p>	<p>Built form: Houses and associated buildings in south-west and south of industrial estate, former clubhouse in north-east, and industrial buildings</p>	<p>Accessibility by public footpath: None</p>
<p>Woodland and copses: Woodland crossing site, along valley, with blocks in south-west and centre</p>	<p>Setting of listed buildings: N/A</p>	<p>Open access areas: None</p>
<p>Wetland and meadow: Former golf course currently maintained by cutting for hay</p>	<p>Scheduled Ancient Monuments: None</p>	<p>Recreational areas: None (golf course no longer in operation)</p>
<p>Common land: None</p>	<p>Settlement pattern: Scattered</p>	
<p>Heathland: None</p>	<p>Contribution of private gardens to landscape character: Some trees to boundaries of properties to west of site</p>	<p>Aesthetic sensitivity - Elements of openness/enclosure: Enclosed, small to medium scale</p>
<p>Other significant vegetation cover: None</p>	<p>Cultural associations: None known</p>	<p>Aesthetic sensitivity – landscape pattern: Somewhat complex and irregular</p>
<p>BAP / BOA / Phase 1 records: None known</p>	<p>Features of cultural importance: None known</p>	

Landscape Capacity Assessment for Green Belt Development Options in the emerging Chiltern and South Bucks Local Plan

<i>Natural factors</i>	<i>Cultural factors</i>	<i>Perceptual features</i>
<p>Presence of SSSI/SINC/local wildlife designation/Semi-Natural Ancient Woodland: Two areas of ancient woodland – one a linear woodland just north of the industrial estate; one a block to the west of this.</p>		
<i>Other information</i>		
<p>Sensitivity score: Medium</p>	<p>Sensitivity score: Low</p>	<p>Sensitivity score: Medium</p>
<p>Landscape sensitivity score: Medium</p>		
<p>Additional comments:</p>		

Relationship with the wider landscape/townscape

Adjacent settlement: Little Chalfont
Character of the urban edge: Largely well vegetated, with some views of houses to north of railway line and to the north-west and houses along Long Walk to south-east and site has some connection with the settlement
Presence in a floodplain: None
Relationship with adjacent wider countryside: Areas of undulating landform and matrix of woodland and grassland largely typical of wider character; garden areas, industrial areas and flat paddocks less representative.
Character of adjacent village(s): The part of the village to the west and north of the site is part of the nucleated settlement and is largely made up of post-war, medium to high density housing, set mostly above the 115m contour. Settlement to the south-west and south-east of the site is largely post-war, medium to low density and more linear in layout. This part of the settlement does not relate well to contours but is set mostly above the 130m contour
Historic links with the wider area if known: None known
Ecological links with the wider area if known: None known
Recreational links with the wider area: None known
Neighbourhood Development Plan / Village Design Statement / Parish Plan / Conservation Area Appraisal – relevant extracts: Not available

**APPENDIX 2
SUMMARY AND TABLE OF CAPACITIES**

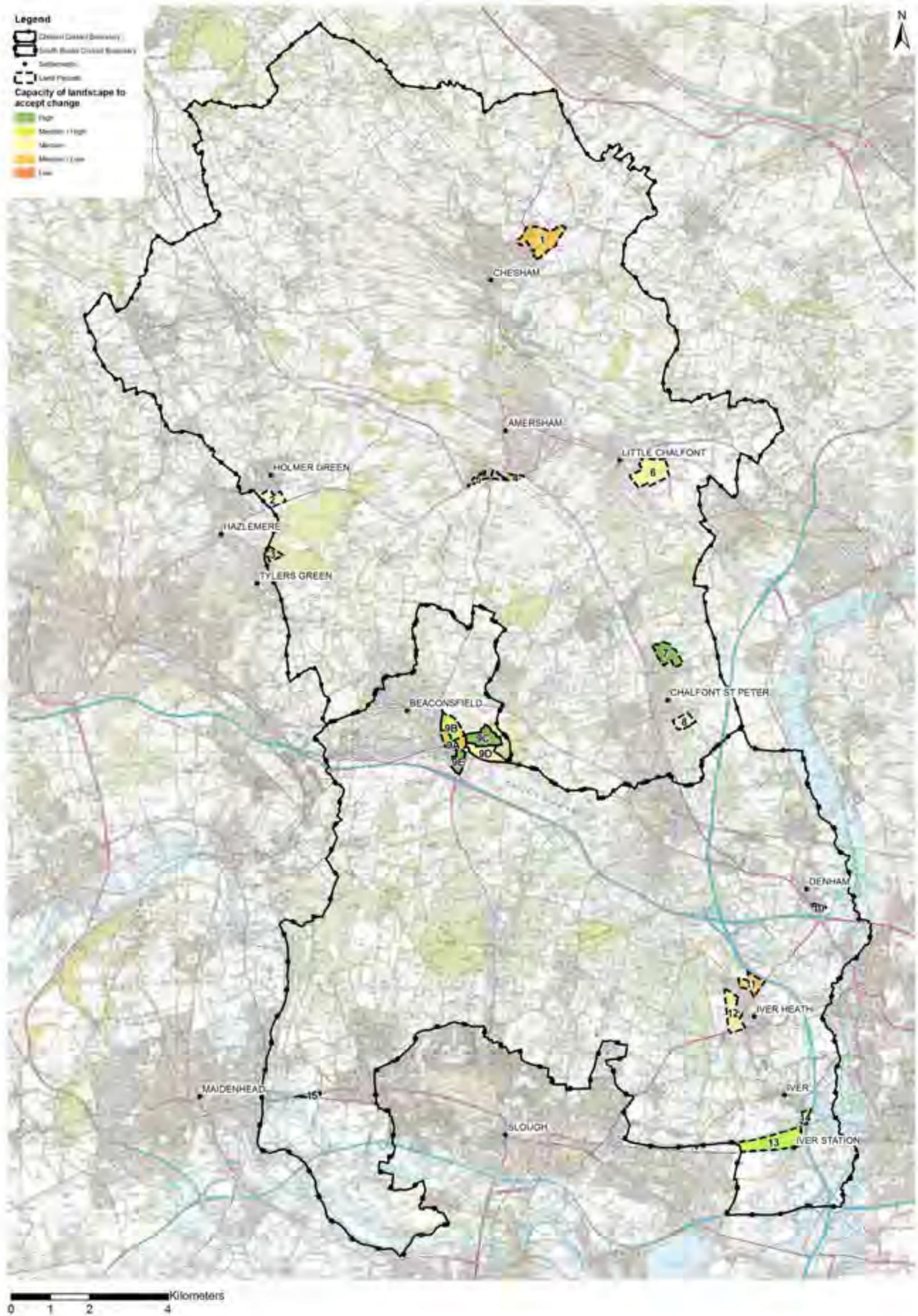
The above analysis has led to the recommendation that 3 sites should not be included as potential housing sites on landscape and visual grounds. Of the remaining 12 sites the landscape capacity varies considerably with a number of the sites amended to show a 'reduced area' where development might be acceptable subject to any landscape or visual constraints, as set out in the site reports. Table A below sets out a summary of the recommendations:

Site no.	Location	Site name and size (ha)	Subdivision	Council	AONB	Colne Valley Regional Park	LCA	Landscape capacity	Recommended potential development area (ha)	Nominal capacity of recommended development area based on housing density proposed by the Council
1	Chesham	North East of Chesham (57.6)	No	Chiltern	Setting	-	16.5	Medium / Low	Reduced area 3.3	115
2	Holmer	Area South of Holmer Green (17.6)	No	Chiltern	Setting	-	18.2	Medium	Reduced area 8.59	257-300
3	Hazlemere	Land East of Hazlemere (9.22)	No	Chiltern	Yes	-	18.2	Medium / Low	X	X
4	Amersham	Area South of London Road West, Amersham Old Town (9.66)	No	Chiltern	Yes	-	13.5	Medium / Low	Reduced area 1.36	40
5	Amersham	Area South East of Whielden Street, Amersham Old Town (5.66)	No	Chiltern	Yes	-	13.5	Low	X	X
6	Little Chalfont	Area South East of Little Chalfont (51.22)	No	Chiltern	Setting	-	18.3	Medium	Reduced area 18.25	547-638
7	Chalfont St Peter	National Epilepsy Centre, Chalfont St Peter (27.97)	No	Chiltern	-	Adjacent	22.2	High	Reduced area 14.2	Refer to report conclusions

Landscape Capacity Assessment for Green Belt Development Options in the emerging Chiltern and South Bucks Local Plan

8	Chalfont St Peter	Area South East of Chalfont St Peter (13.71)	No	Chiltern	-	Yes	22.2	Medium	Reduced area 5.57	195
9	Beaconsfield	Area East of Beaconsfield (117.39)	Yes	South Bucks	-	-	22.1	9.A Medium / Low	Reduced area 1.97	59
								9.B Medium / High	Reduced area 13.85	415
								9.C High	Reduced area 15.9	477
								9.D Medium	Reduced area 5.63	169
								9.E High	Reduced area 6.4	192
10	Denham	Land North of Denham Roundabout (4.65)	No	South Bucks	-	Yes	26.3	Medium / High	Reduced area 3.5	Refer to report conclusions
11	Iver Heath,	Land North of Iver Heath, South East of Pinewood (19.41)	No	South Bucks	-	Yes	22.4	Medium / Low	X	X
12	Iver Heath,	Area West of Iver Heath (31.65)	No	South Bucks	-	Yes	22.4	Medium	Reduced area 12	420
13	Iver	Area North of Iver Station (33.86)	No	South Bucks	-	Yes	22.4	Medium / High	Reduced area 40.71	Refer to report conclusions
14	Iver	Area to the East of Ridgeway Business Park, Iver (6.2)	No	South Bucks	-	Yes	26.3	Medium / High	Reduced area 3.3	Refer to report conclusions
15	Burnham	Land adjacent to Taplow Station (4.41)	No	South Bucks	-	-	20.2	Medium / High	Reduced area 1.3	Refer to report conclusions

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Appendix 8 Appeal Decision Ref 3209551



Appeal Decision

Inquiry held 2-5 April 2019 and 16 May 2019

Site visit made on 15 May 2019

by Stephen Normington BSc DipTP MRICS MRTPI FIQ FIHE

an Inspector appointed by the Secretary of State

Decision date: 21st June 2019

Appeal Ref: APP/D3125/W/18/3209551 Land north of Woodstock Road, Stonesfield

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr Robinson, Ms Evins and Cala Land Management Ltd against the decision of West Oxfordshire District Council.
 - The application Ref 17/01670/FUL, dated 23 May 2017, was refused by notice dated 1 May 2018.
 - The development proposed is residential development consisting 68 dwellings, public open space and new vehicular access onto Woodstock Road.
-

Decision

1. The appeal is dismissed.

Preliminary and Procedural Matters

2. At the time the Council made its decision on the planning application the Development Plan comprised the West Oxfordshire Local Plan 2006-2011. The Council's Decision Notice also referred to a conflict with policies contained in the emerging West Oxfordshire Local Plan 2011-2031 (eWOLP). This emerging plan was adopted on 27th September 2018. Therefore, the Development Plan now comprises the West Oxfordshire Local Plan 2011-2031 (WOLP). The policies contained within the 2006-2011 Local Plan have been superseded by those contained within the recently adopted plan.
3. The Council's Decision Notice refers to the emerging policies in the eWOLP, at the time, that were relevant to the consideration of the application. Those policies are now adopted in the new plan. The policies retain the same reference numbers as they did prior to adoption except former Policy EH1a (Cotswolds Area of Outstanding Natural Beauty) is now Policy EH1, former Policy EH1 (Landscape Character) is now EH2 and former policy EH3 (Public Realm and Green Infrastructure) is now Policy EH4. These policy changes and the status of the recently adopted plan are recognised in the Statement of Common Ground (SoCG) dated 29 March 2019. Consequently, I do not consider that either main party has been prejudiced by the recent change in the local planning policy position.
4. During the Inquiry two Agreements pursuant to Section 106 of the Town and Country Planning Act 1990 were provided, both signed and dated

16th May 2019. These agreements, between the appellants and Oxfordshire County Council (OCC) and the appellants and West Oxfordshire District Council (the Council), are considered later in this decision. The Council agree that the completed and executed S106 Agreements would resolve its concerns relating to the pressure on the local infrastructure within the district and overcomes the second reason for refusal.

5. Community Infrastructure Levy (CIL) Compliance Statements were submitted at the Inquiry by OCC and the Council. I have had regard to the provisions of the obligations contained within the certified copies of the completed S106 Agreements in the consideration of this appeal and I shall return to this later in this decision.
6. Stonesfield Parish Council, Sustainable Stonesfield and the Cotswold Conservation Board were accorded Rule 6(6) party status as a combined party and presented evidence in support of its objections to the proposals.
7. There is some dispute between the main parties as to whether the Council can demonstrate a five year supply of deliverable housing sites. However, a Written Ministerial Statement (WMS) dated 12 September 2018 was made in relation to Housing Land Supply in Oxfordshire. This stated that for the purposes of decision-taking the provisions of paragraph 11(d) and footnote 7 of the National Planning Policy Framework (the Framework) will only apply where the local authorities in Oxfordshire cannot demonstrate a three year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 73 of the Framework). Both main parties agree that the Council can demonstrate a three year supply of deliverable housing sites and therefore, the 'tilted balance' as indicated in paragraph 11(d) of the Framework is not engaged in the consideration of this appeal.

Main Issues

8. Having taken into account the evidence before me and from what I heard at the Inquiry, the main issues are:
 - The effect of the proposed development on the character and appearance of the surrounding area with particular regard to the Cotswolds Area of Outstanding Natural Beauty (AONB).
 - Whether there are any exceptional circumstances which justify major development within the AONB and whether such development would be in the public interest.
 - Whether the proposed development would be appropriately located, taking into account the planning balance of whether any adverse impacts of approving the development would outweigh the benefits when assessed against the policies in the Development Plan and the National Planning Policy Framework (the Framework) taken as a whole.

Reasons

The appeal site and proposed development

9. The appeal site is located to the east of the village of Stonesfield and comprises a broadly square shaped area of part of a gently sloping agricultural field located immediately to the north of Woodstock Road. There are established hedgerows to the north and south boundaries. The western boundary is formed by the rear gardens of existing residential properties at Woodstock Road and Greenfield Crescent. The eastern boundary is not currently defined. Beyond the site to the north is a large recreation ground incorporating sports facilities, children's playground and the village hall. To the south of Woodstock Road is recently constructed housing development at Charity Farm. To the east lies open countryside.
10. The village benefits from a range of services, including a primary school, food shop, community building, sports facilities, and pub. On the basis of its location and facilities, both main parties consider that the village is a suitable location for some new housing development. I concur with this view.
11. The appellants also own land immediately adjacent to the eastern boundary of the appeal site which is proposed to be used for additional planting and landscaping of at least 50m in depth. For the purposes of the Inquiry this was identified as the "blue" land. I shall return to this land later in this decision. The site is located within the Cotswolds AONB. The AONB designation washes over the village and the surrounding countryside.
12. The proposed development would deliver 68 two storey dwellings with a single point of vehicular access off Woodstock Road located broadly centrally on the southern boundary of the site. The scheme would provide for 50% of the dwellings constructed as affordable homes. In this respect the proposed development would accord with the provisions of Policy H3 of the WOLP.

Planning Policy Context

13. Paragraph 172 of the Framework states that great weight should be given to conserving and enhancing landscape and scenic beauty in, amongst other areas, AONB's which have the highest status of protection in relation to landscape and scenic beauty. It further states that planning permission should be refused for major development in these designated areas other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
14. With regard to local planning policies, Policy OS2 of the WOLP sets out the overall spatial strategy for the District based on a settlement hierarchy. The 1st tier settlements comprise the Main Service Centres¹; the 2nd tier Rural Service Centres²; 3rd tier Villages (including Stonesfield); and the 4th tier comprising all other villages, hamlets and the open countryside. The policy identifies that the villages are suitable for limited development which respects the village character and local distinctiveness and would help to maintain the vitality of these communities. It further states that proposals for residential development will be considered in accordance with Policy H2 of the WOLP.

¹ Whitney, Carterton and Chipping Norton

² Bampton, Burford, Charlbury, Eynsham, Long Hanborough, Oxfordshire Cotswolds Garden Village and Woodstock

15. The policy also identifies some general principles with which development proposals should comply. Of particular relevance in the determination of this appeal, those general principles, amongst other things, require proposals to be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality; form a logical complement to the existing scale and pattern of development and/or the character of the area; as far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s; and in the AONB, give great weight to conserving landscape and scenic beauty and comply with national policy concerning major development.
16. The WOLP divides the district into five housing sub-areas for each of which Policy H1 considers the amount and distribution of housing and provides a minimum housing requirement figure. Stonesfield is located within the Burford-Charlbury (B-C) sub-area which is located almost entirely within the AONB. The policy identifies that 774 homes are required in the sub-area in the plan period 2011–2031 and further states that ‘this is an indicative distribution based on past completions and anticipated future supply and should not be taken as an absolute target for each sub-area or maximum ceiling to limit development.’
17. Paragraph 5.21 provides supporting text to Policy H1 and states that the 774 homes figure should not be treated as a ‘cap’ or ‘ceiling’ to development and planning permission may be granted for additional housing within the sub-area where the proposed development is shown to accord with national and local policy including Policies H1, H2, OS2 and EH1.
18. Policy H2 relates to the delivery of new homes. It identifies that development in the Villages will be permitted on undeveloped land adjoining the built up area where convincing evidence is presented to demonstrate that it is necessary to meet identified housing needs.
19. Policy BC1 addresses development within the B-C sub area. It identifies that development outside of the Rural Service Centres will be limited to meeting local housing, community and business needs and will be steered towards the larger villages. Paragraph 9.6.7 of the WOLP provides supporting text to Policy BC1 and indicates that Stonesfield has seen considerable consolidation of development in the past with redevelopment of farmyards and conversion of barns for housing primarily during the 1980s. There has been only limited new build in recent years as few opportunities remain for residential intensification.
20. The supporting text in paragraph 9.6.29 indicates that housing development will be permitted within the B–C sub area but proposals will be considered on a case by case basis and it will need to be convincingly demonstrated that a scheme would give rise to benefits to the specific settlement or the sub area (e.g. meeting identified local housing needs) and which would clearly outweigh any likely harms (e.g. heritage, landscape, impact on local services). The supporting text then mirrors national policy requirements, as set out in paragraph 172 of the Framework, for major development within the AONB stating that housing proposals which constitute ‘major development’ will only be permitted in exceptional circumstances and where it can be demonstrated that they are in the public interest.
21. The WOLP addresses development in the AONB through Policy EH1. This policy identifies that the Cotswolds Conservation Board’s Management Plan and

Guidance documents are material considerations in decision making relevant to the AONB. It further states that major development will not be permitted within the AONB other than in exceptional circumstances, as required by national policy and guidance. The policy is supportive of development proposals that support the economy and social wellbeing of communities located in the AONB, including affordable housing schemes, provided they are consistent with the great weight that must be given to conserving and enhancing the landscape and natural scenic beauty of the area.

22. WOLP Policies EH2 (Landscape Character) and OS4 (High Quality Design) are also referred to in the Council's reasons for the refusal of planning permission. These policies are similar in their approach to the design of development and its impact on the landscape. Of particular relevance to this appeal is that, these policies, amongst other things, requires that new development should conserve and, where possible, enhance the intrinsic character, quality and distinctive of the surrounding and local landscape.

Planning history and background

23. The appeal site was initially promoted as a draft allocation for housing development in the eWOLP and was subject to a number of technical appraisals undertaken by the Council. Therefore, in order to conclude on the main issues in this appeal it is necessary to consider the planning background in relation to the appeal site.
24. The Main Modifications to the eWOLP, published in November 2016, proposed the allocation of the site through Policy BC1a which indicated that the site had an indicative capacity of 'around 50 dwellings'³. The West Oxfordshire Strategic Housing and Economic Land Availability Assessment (SHELAA) published in December 2016 also identified that the appeal site was suitable for development and was considered to form a logical extension to this part of the village.
25. In June 2017 the Council produced a Housing Site Selection Paper (HSSP) to inform the Stage 3 examinations in public hearings (EiP) for the eWOLP. The appeal site was one of four draft allocations in the AONB. The Council considered that the four sites which have been allocated within the AONB were capable of being brought forward for development without having a detrimental impact on the environment, landscape or recreational opportunities that cannot be mitigated through appropriate design, layout and landscape treatment. At that time the Council was of the view that the "particular nature and context of the four sites, together with the relatively modest scale of development proposed and the potential for positive enhancement through development, means that they will not cause harm to the landscape and scenic beauty of the AONB⁴."
26. In July 2017 the Council agreed a Statement of Common Ground with the appellants for the purposes of the EiP. This stated that "Provided a suitable landscape buffer is incorporated on the eastern boundary of the site as an integral part of any development scheme, the parties agree that the is capable of residential development without causing significant harm in terms of

³ CD D6 page 292

⁴ CD D10 paragraph 7.18

landscape and visual impact⁵.” It further identified that the appellants had included a landscape buffer on the eastern boundary (the ‘blue land’) in the planning application. This was the application which is the subject of this appeal.

27. During the EiP hearings the Council agreed to commission additional landscape and heritage advice in relation to seven site allocations proposed in the eWOLP, including the appeal site. Chris Blandford Associates (CBA) were subsequently commissioned in August 2017 to provide the additional landscape and heritage advice in relation to the seven proposed site allocations. In relation to the appeal site the CBA Report concluded that the overall landscape north of Woodstock Road site is considered to be of medium landscape sensitivity and medium-high visual sensitivity. It further identified that a few AONB elements/characteristics and special qualities here could be vulnerable to development but it is not considered that they would preclude it, subject to an appropriate character, form, density and design. Taking the above into account it was concluded that a development of approximately 50 homes could be successfully accommodated on the site, ensuring that development is generally of low density⁶. The report thereafter provided a number of recommendations in relation to the landscape and built form design of development on the site.
28. The Council, in October 2017, published a Cotswolds AONB Topic Paper to further inform the EiP. The purpose of this topic paper is to consider the findings of the CBA report in relation to the proposed sites in the context of national policy requirements, in particular the extent to which exceptional circumstances exist to justify major development within the Cotswolds AONB. In this regard, the Topic Paper considered matters relating to housing need within the AONB, which will be addressed later in this decision. The Topic Paper concluded that “the Council considers that the case for allocating each of the sites proposed in the Burford - Charlbury sub area (including the appeal site) is fully justified and in each case, the exceptional circumstances test for development in the AONB set out in the NPPF (the Framework) has been met⁷.”
29. The Inspector undertaking the resumed EiP identified in his letter dated 16 January 2018⁸ that the AONB does not represent a policy embargo on new housing and that some new housing is appropriate within the AONB. His conclusions were that there was little case for the plan to provide more than the 774 committed dwellings within the B-C sub area “simply to ensure that district-wide housing needs are met” and further determined that the four proposed allocations were “not essential to the soundness of the plan”. Although the Inspector did not rule out development coming forward on the proposed four sites, his view was that this should be considered through the development management process based on detailed evidence submitted as part of specific planning applications.
30. The above views of the Examining Inspector were broadly expressed in his report⁹ which concluded that allocation of the sites in the B-C sub area would not be sound. Consequently, the appeal site was not included as an allocation in the adopted WOLP.

⁵ CD D13 paragraph 3.12

⁶ CD G2 paragraphs 6.2.24 and 6.2.25

⁷ CD D15 paragraph 5.1

⁸ CD D4

⁹ CD D4

31. At the Inquiry the appellants placed considerable emphasis on the Council's initial position of support for the principle of the proposed development up to the point of the Examining Inspector's letter of 16 January 2018. I shall return to aspects of this planning history later in this report.
32. I recognise the appellants' position, against the above background, that the Council may have been inconsistent in its views on the appeal scheme from its initial apparent supportive stance resulting in a decision to refuse planning permission. However, the Examining Inspector was clear in that in order to justify development in the AONB a site-specific analysis of individual schemes needs to be undertaken with detailed evidence dealing with the extent of the harm that development would cause to the AONB and the extent to which exceptional circumstances can be justified and appropriate considered in the planning balance. It is therefore necessary to consider that extent of any landscape and visual harm that the proposed development may cause to the character and appearance of the surrounding area with particular regard to the AONB.

Character and appearance

33. The appeal site and the surrounding area are subject to several sub-regional and local landscape character assessments. The Cotswolds AONB Landscape Character Assessment identifies the appeal site as being located within Landscape Character Type 11 – Dip Slope Lowland¹⁰. Key relevant characteristics define the character type as a broad area of gently sloping, undulating lowland with a strong and structured farmland landscape within a mosaic of medium to large fields.
34. The assessment further separates the above landscape character into two areas. The appeal site is located within landscape character area '11B Stonesfield Lowlands'. The area beyond the settlement is broadly described as being emphasised by large fields, low hedges with evidence of hedgerow loss. In my view, the appeal site is a typical component part and contributory feature of the broad landscape characteristics identified in the assessment.
35. The above assessment underpins the Cotswolds AONB Landscape Strategy and Guidelines (June 2016)¹¹ which, amongst other things, seeks to manage the effects of potential change within the AONB. With respect to new development the guidelines broadly identify that the expansion of settlements should "maintain the open, sparsely settled character of the Dip Slope Lowland by limiting new development to existing settlements and avoid development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements on areas of open landscape; ensuring that new development is proportionate and does not overwhelm the existing settlement; the layout should respect local built character; be visually integrated into its surroundings with harsh edges broken up with appropriate adequate tree planting."
36. At a more local level, the Oxfordshire Wildlife and Landscape Study 2004 (OWLS)¹² and the West Oxfordshire Landscape Assessment 1998 (WOLA)¹³ provide more localised landscape character assessment. The OWLS, amongst

¹⁰ Appendices 7 and 8 Mr Cook's PoE

¹¹ Appendix 9 Mr Cook's PoE

¹² Appendix 5 Mr Cook's PoE

¹³ Appendices 3 and 4 Mr Cook's PoE

- other things, identifies the area surrounding the appeal site as wooded estate land with regular shaped field patterns dominated by arable fields.
37. The appeal site lies within the Lower Evenlode Valley as identified in the WOLA which, amongst other things, sets out key characteristics as large scale smoothly rolling farmland very open and exposed character and having high intervisibility. The document notes that the area has a highly attractive and unspoilt character but with some localised variations in quality. It also notes on page 45 that there are a number of factors that can potentially threaten landscape quality. Expansion and 'suburbanisation' of rural settlements and roads are identified as examples of such threats.
38. There is no dispute between the parties that the proposal constitutes major development for the purposes of paragraph 172 of the Framework. The landscape and visual impact of potential development on the site have been considered in a number of consultancy produced Landscape and Visual Impact Assessments (LVIAs) including those undertaken on behalf of the Council as part of the potential allocation of the site, by the appellants as part of the planning application and separately in this appeal and by the Rule 6 party.
39. Whilst there is a degree of commonality in aspects of these LVIAs, there are variances in the assessment of the magnitude of change and the significance of the impact of development. This is not uncommon in considering a subjective analysis of landscape and visual impact and I have taken all of these relevant LVIA's into account in reaching my views below. However, there is commonality in that the LVIA's broadly agree that the value of the landscape site and its immediate environs is medium, which indicates that the site itself is not a 'valued' landscape for the purposes of paragraph 170 of the Framework.
40. Whatever 'value' is attached to the appeal site itself, it still forms part of the overall high value protected landscape of the AONB and is a localised component of the landscape setting of Stonefield within the sensitive Lower Evenlode Valley Landscape Area. The site cannot be developed without a total change to the baseline situation. The current open arable field that forms an integral part of the landscape character of the area and the approach to the village would be changed to a cul-de-sac housing development that, in my view, owing to its scale, would display sub-urban characteristics in its appearance with peripheral tree and hedge planting. In this regard, I agree with the Rule 6 parties that the site exhibits a 'high' susceptibility to change.
41. Landscape Sensitivity can be represented by a combination of the landscape value of a site and its susceptibility to change. In this case, I consider that this translates to a site landscape sensitivity of high/medium. To understand the significance of the effect of development on the landscape it is necessary to consider the landscape sensitivity with the magnitude of change. In particular, the effect on key landscape components of the landscape type, as set out in the character area assessments, the setting of Stonefield, the character of the Woodstock Road in its approach to the village and the agricultural landscape of this part of the dip slope lowlands.
42. Taking these factors into account, and based on the analysis of the various LVIA's, I find that overall landscape significance of the site is major/moderate. Owing to its scale and cul-de-sac nature, I consider that the proposed development would not acceptably visually integrate into its surroundings. It would appear as a significant standalone extension to the village that, owing to

its extent and suburban form, would significantly and adversely change the character of the approach to the village. The proposed development and would appear as an unacceptably dominant feature in views of the village from the approach along Woodstock Road.

43. Whilst I have no concerns regarding the proposed density of the development, in my view, its layout is unexceptional and displays elements of a typical suburban form with relatively regular spaced dwellings. I have no evidence to suggest that the scheme builds sympathetically upon any of the distinctive features of Stonesfield, albeit that some of the proposed materials would reflect those used elsewhere in the village. Contrary to the appellants' view, I do not consider that there are any distinctive elements of the scheme that could contribute to a description of this being 'high quality'. In considering the impact of change the scheme would not make any distinctive contribution to the character of the landscape other than replacing the open field with a relatively substantial suburban form.
44. I have considered the visual form of the current edge of the village at the rear of Greenfield Crescent. Whilst I accept that this is relatively harsh in its appearance at the interface with the countryside to the east, to some extent this is mitigated by the predominant single storey nature of the development. As such, Greenfield Crescent does not appear as an overly dominant feature in views from the east of the village. Furthermore, I am led to believe that this development was constructed in the 1960's. Consequently, the development was there prior to all of the landscape character assessments that I have referred to above. As such, it formed part and parcel of the established and settled character of the area considered in those assessments. By contrast, the proposed development would conspicuously extend the settled village edge of Stonesfield in the landscape
45. Whilst the proposed development would provide some screening to the rear of Greenfield Crescent as part of the proposed Green Infrastructure Strategy¹⁴, I do not consider this to be of such significance to be afforded substantial weight. The proposed planting around the periphery of the site and on the 'blue' land would provide some degree of screening and to some extent 'soften' the approach to the village in views from the east. However, owing to the local topography, the 'blue' land and the south east portion of the site is at a lower level in comparison to the rest of the site. Consequently, the proposed planting would be at a lower level. Whilst there would be some screening after ten years, it is highly likely that views of the built development in the medium term would still be attainable. Furthermore, given the two-storey design of the proposed dwellings the roof tops of are likely to be visible above the planting on maturity in views from the higher ground to the east and on the approach to the village from Woodstock Road in the vicinity of Limbeck Farm.
46. The proposed planting would have a degree of positive benefit on maturity by providing a less abrupt edge to the settlement. However, I am not persuaded that the proposed planting would be effective in the short to medium term and even on maturity it is unlikely to eliminate some views of the development.
47. The appellants identify the appeal site as being a 'peri-urban' environment predominantly due to its relationship with Greenfield Crescent and the recreation ground to the north. I do not share this view. The site is part and

¹⁴ Appendix 13 Mr Cook's PoE

parcel of the landscape described in the various character assessments and contributes positively to the landscape of the AONB as a whole.

48. The creation of woodland and planting belts themselves will change the open rural character of the area. The planted blocks are proposed to mitigate the harm that would be caused by the built development. However, the proposed planting itself would introduce further landscape change to screen a development that would already cause significant harm to the landscape. Consequently, the positive attributes of the scheme provided in the Green Infrastructure Strategy do not alter my view that the loss of part of the field, which is characteristic of the local landscape, and its replacement by 68 dwellings would represent a highly adverse magnitude of change, contrary to Policy EH2 of the WOLP.
49. Overall, in considering the landscape impacts of the proposal, the development would be contrary to the guidelines provided in the Cotswolds AONB Landscape Strategy and Guidelines. In particular, as an expansion of the settlement, it would not maintain the open, sparsely settled character of the Dip Slope Lowland. It would intrude negatively into the landscape by eroding part of its open character. The landscape impacts would not be wholly successfully mitigated and its standalone cul-de-sac nature would not successfully integrate into the morphology of the existing village. Overall, I consider this harm to a high/medium sensitivity landscape to be substantial.
50. Turning now to the visual impacts of the proposal, my unaccompanied site visit followed the route agreed by the parties at the Inquiry¹⁵. Owing to the substantial hedgerow around the recreation ground to the north and the along Farley Lane I do not consider the proposed development would be readily visible in views from these locations to an extent that would cause any significant harm to receptors. In distant views from the Shakespeare Way footpath the rooftops of the development would likely be seen as an extension to the village. However, given the intervening distance between the appeal site and the footpath the overall effect on users of the path would not be harmful.
51. I observed views of the appeal site from the Oxfordshire Way public footpath which runs parallel with Woodstock Road and is located to the south of the appeal site. This appears to be a well-used public right of way of County strategic importance and the users of which I consider to be sensitive receptors.
52. In wider views from the east in the vicinity of Akeman Street the appeal site is not readily discernible owing to the nature of the surrounding topography. However, views of the appeal site become quite apparent as the footpath approaches the village travelling south west. Such current views looking towards the village on this approach are dominated by the incongruity of the Charity Farm development which, owing to its urban form and materials, appears as a disjointed protrusion into the rural landscape and displays little integration with the rest of the village. This development serves to emphasise my concerns at the sensitivity of the landscape to change and the harm that can be created by a relatively large-scale modern development that fails to integrate into its surrounds.

¹⁵ Inquiry Document 25

53. The proposed development would add to this incongruity. The cumulative visual impacts of the existing and proposed development when viewed from Oxfordshire Way would fundamentally and unacceptably change the characteristic open character of the dip slope lowland. This change would be visibly and perceptibly experienced at close quarters by users of the public right of way on the approach to the village such that in views looking north west the village would appear as more of a modern 'suburbanisation' of a rural settlements within the AONB. This change would be substantial and would adversely affect the enjoyment of the users of path.
54. Woodstock Road is relatively straight and forms one of the main approaches to Stonesfield. In being straight, and having a falling gradient from Wootton Wood towards the village, it provides substantial views of Stonesfield and the surrounding countryside. Users of the road are sensitive receptors. The appearance and rural character of this part of the AONB would be unacceptably changed and a more suburban character would prevail. This would unacceptably harm the rural setting of Stonesfield within the context of the settled landscape articulated in the various character assessments.
55. I have also taken into account the considerable debate at the Inquiry regarding the number of proposed dwellings. In particular, whether the results of the LVIAs undertaken as part of the eWOLP indicated that a maximum of 50 dwellings may have been permissible and the Council's views that the 68 now proposed grossly exceeds that which was considered acceptable at the time. However, the LVIAs, in defining approximately 50 dwellings, were not prescriptive in setting any ceiling on dwelling numbers.
56. Although the Council and the Rule 6 party expressed concerns at the density of the proposed development, I consider that a net density of 24 dwellings per hectare is not unusual for a village location. Consequently, I do not consider that the density of the proposed development would overly higher in the proposed location. Moreover, the alleged differences between a 50 or 68 dwelling development have had little material bearing on my assessment of the landscape and visual effects of the proposal before me.
57. I recognise that previous assessments, undertaken at a time when the Council could not define a 5 year supply of housing land, identified that the site could potentially support a development of around 50 dwellings. However, in the consideration of detailed evidence submitted as part of this specific planning application, as suggested by the EiP Inspector, I find that the proposed development would cause unacceptable harm in both landscape and visual terms. Accordingly, and notwithstanding the findings in previous studies, I conclude that the development would have a significant adverse effect on the character and appearance of the AONB, contrary to paragraph 172 of the Framework. It would also be contrary to Policies EH1, EH2 and OS1 of the WOLP
58. Having identified that there would be harm to the special qualities of the AONB it is necessary to consider the first test identified in paragraph 172 of the Framework. In particular, whether there would be any exceptional circumstances that are relevant to the consideration of the overall planning balance and whether it can be demonstrated that the development is in the public interest.

Whether or not there are exceptional circumstances

59. The development plan, particularly through policies OS2, H2 and BC1 read in combination, only permits development harmful to the AONB on undeveloped land adjacent to villages in the B-C sub area in exceptional circumstances and where convincing evidence is provided to demonstrate that the development is necessary to meet an identified local housing need. Whilst there are other benefits of the scheme, which I consider later in this decision, the primary benefits identified by the appellant are those relating to the provision of market and affordable housing.
60. There is disagreement between the main parties as to what may constitute 'local housing need' and whether this should be considered at a sub-area or settlement level. In that regard, the supporting text to Policy H2 of the WOLP identifies in paragraph 5.39 that "Within the Cotswolds AONB, windfall housing proposals on undeveloped land adjoining built up areas will be particularly closely scrutinised and will only be supported where there is convincing evidence of a specific local housing need such as identified through a neighbourhood plan or affordable housing needs specific to a particular settlement, for example through a rural exception site". Policy BC1 identifies that development will be steered to the larger villages and will be limited to meeting local housing needs. Therefore, in considering housing need within the context of the policy framework in the development plan, I take the view that local housing need means need of a specific settlement.
61. The appellants have referred in detail to part of the evidence base for the eWOLP. In particular, and at the request of the Examining Inspector, the Council commissioned a report from Peter Brett Associates (PBA)¹⁶. This informed the Cotswolds AONB Topic Paper, mentioned earlier in this decision, and dealt with the housing need element within the B-C sub area. The conclusions of this report, based on projections, estimated that there was a minimum housing need for the B-C sub area of 834 homes over the plan period which is more than the 774 identified in Policy H1 in the plan. In addition to the completions over the period 2011-15, projections in the report suggested a need for 1,134 dwellings over the plan period.
62. The Examining Inspector's Report identified that whilst the PBA report is useful evidence as a starting point, it merely indicates the likely implications of various levels of housing growth for the sub area's population and resident labour force. Neither it nor any other substantive evidence before the examination identifies a housing requirement figure for the Burford – Charlbury sub-area which appropriately reflects needs, constraints, relevant national policy and the key issues for development and transport detailed in the Cotswolds AONB Management Plan (2013-2018).
63. The Examining Inspector concluded that in the absence of a specific housing need figure for the sub-area, it is not possible to identify that new dwellings, over and above existing completions and commitments, are as a matter of principle, necessary specifically in the context of the AONB or the Burford – Charlbury sub-area¹⁷.

¹⁶ CD E9

¹⁷ CD D4 paragraph 219

64. The WOLP is a recently adopted plan which at the time of adoption provided for a 5 year housing supply (HLS) using a staged delivery with a 20% buffer applied. The Council referred to the HLS figures, published in November 2018 for the period 2018-2023¹⁸ which indicated that HLS exceeds 6 years. The Council therefore considers that it does not have an identified 'need' for further deliverable market housing. Furthermore, no windfall sites of any size are relied upon in the B-C sub area in the HLS¹⁹.
65. Therefore, the Council's position is that on the current evidence available the identified housing needs for market and affordable housing in the District is likely to be met without further sites. As such, the Council considers that it does not rely on proposals such as the appeal development to meet its HLS. Furthermore, the HLS does not rely on future large windfall sites of any size at all within the B-C sub area and there is no need for additional large housing sites anywhere in the District beyond those already committed and/or allocated.
66. The appellants have attempted to calculate housing need in Stonesfield using the PBA Report as a starting point²⁰. In the period 2011-18 the appellant indicates that 333 dwellings were completed in the sub area leaving a residual of 801 to be built in the period 2018-31 (1134-333) which would equate to 723 households. Stonesfield accommodated 9.04% of the dwelling stock of the sub area in 2011 and so the appellants consider that it would be expected that of the 723 households, 65 would need to be accommodated in Stonesfield (9.04% of 723). Applying an appropriate market signals uplift based on affordability data²¹ would suggest that there would be a minimum local housing need in Stonesfield in the period 2018-31 of 96 dwellings.
67. The Council's Housing Land Supply Position Statement November 2018²² identifies a committed supply of 24 dwellings in Stonesfield. The appellants also contend that 62 dwellings were constructed in the period 2011-18. Mr Woods also identified that an additional 5 dwellings have been permitted at Land West of North Farm, Woodstock Road²³ which provides for a total of 91 dwellings across the plan period or 29 dwellings across the remainder of the plan period. This compares to the minimum indicative need for either 123 across the plan period based on the PBA report or a minimum of 96 dwellings across the remainder of the plan period taking into account the uplift. The appellants therefore contend that a minimum of 32 to 67 dwellings will be needed through the development management process to meet the needs of Stonesfield.
68. In addition to the above, the appellants also consider that the Council is unable to demonstrate a 5 year housing supply. Although this does not trigger the tilted balance, they consider that it further underlines the need for additional housing provision across the district including the B-C sub area and Stonesfield.
69. The appellants have produced detailed evidence as to why the Council may not have a 5 year housing supply across the District and in the sub area. I have carefully considered this evidence which provides a useful overview of the housing market in the district at the current time. However, notwithstanding

¹⁸ Appendix 5a Mr Wood's PoE

¹⁹ Paragraph 7.16 Mr Wood PoE .

²⁰ Section 5 Mr Tiley's PoE

²¹ Paragraph 5.4 Mr Tiley's PoE

²² CD E21

²³ Paragraph 4.40 Mr Woods PoE

the level of detail contained within the evidence of Mr Tiley, it does not provide convincing evidence of a local housing need specific to the settlement which is a requirement of the application of Policy H2, as indicated in the supporting text set out in paragraph 5.39 of the WOLP.

70. In the absence of any other published and evidenced figure regarding housing need in Stonesfield, the appellants attempts to calculate a figure are not without some merit. However, it would be inconsistent with the Examining Inspector's findings to suggest that figures based on the PBA Report establish anything more than a "broadly indicative housing need". Consequently, taking into account the Council's views on the HLS position, I do not consider the appellants calculation basis is sufficiently robust to provide a defined need figure for Stonesfield.
71. Moreover, the WOLP is recent adopted plan and which does not rely on windfalls from the B-C sub area. There is only limited information available of HLS figures since adoption on which to forecast any trends with certainty. Consequently, any alleged underperformance in delivery at this early stage of the plan period is not necessarily a reliable indicator of longer-term effects. Against this background, I do not consider that the appellants' calculations of Stonesfield's alleged housing need provides a robust basis, at this time, on which to deduce that this constitutes convincing evidence of local housing need sufficient to conclude that an exceptional circumstance exists.
72. Turning now to affordable housing, the appeal proposal would provide 34 affordable homes, in line with the requirements of Policy H3 and which could be secured through the planning obligation. The Council accepts that this would be a benefit of the scheme and I have no reasons to doubt that view. However, in considering the requirements of Policies H2 and BC1 the affordable housing need in Stonesfield requires to be considered.
73. The appellants case on affordable housing need in Stonesfield is predominantly predicated on the information contained in the Council's Affordable Housing Register (AHR). I accept the analogy of the findings of the Inspector in the 'Hailey' appeal decision²⁴ that the expression of a preference on the AHR does not equate to a need to be accommodated in Stonesfield as since applicants may express a preference for more than one part of the District.
74. The use of the AHR has limitations which impact on its reliability in providing a sound evidence basis. In particular, anyone can add their name to the AHR irrespective of actual need as no assessment is made at that point. There are 42 individuals whose names are on the AHR and are classified as "bronze" being "low housing need". The mere presence of a name on the AHR indicating a preference for Stonesfield cannot be relied upon as establishing a need to house them in Stonesfield. There are names who indicate a preference for Stonesfield but also a location outside of the AONB and as such it is not necessary to build housing within the AONB to accommodate the needs of these individuals. Only 2 of the 52 names on the AHR said they only wished to live in Stonesfield only.
75. In the light of the above limitations in the use of the AHR I do not consider this to be a robust mechanism to constitute clear and convincing evidence of a need for 34 affordable homes in Stonesfield. On the evidence available the proposed

²⁴ Inquiry Document 29

34 affordable homes could constitute an oversupply in terms of meeting a local need specific to the settlement.

76. In arriving at this view, I have taken into account the evidence of Mr Tiley regarding the increase in average house prices in Stonesfield, the fact that rental prices in the village are greater than those across the district, the affordability across the district in comparison the rest of south east England, the number of concealed households, the demography of the village and in particular the population age, the number of affordable homes in the village and homelessness across the district. I have no reason to doubt any of these factors, which were not disputed by the Council. However, as important as they are, they do not assist in defining an affordable housing need in Stonefield.
77. I accept that district wide there may be a need for the delivery of more affordable homes. However, in considering the exceptional circumstance test to justify development within the AONB I do not consider that the evidence before me provides convincing case to demonstrate that the development which includes 34 affordable units is necessary to meet an identified local housing need in Stonesfield.
78. Taking the above factors into account, I find that the evidence in this case is not sufficiently convincing to demonstrate that the development is necessary to meet an identified specific local housing need. Consequently, the proposed development would be contrary to Policies OS2, EH1, H2 and BC1 of the WOLP.

Other benefits of the proposal

79. Notwithstanding my findings above regarding the demonstration of a local identified need, the proposed development would contribute to the supply of market and affordable homes in the district. This factor does attract substantial weight.
80. There would be economic benefits from the construction jobs and then from the increased use of the settlements services which would support the vitality of the village. In this regard the proposal would gain some support from some of the provisions of Policy OS2. These factors also attract substantial weight.
81. The scheme would deliver new public open space and additional recreational opportunities on the 'blue' land. However, the 'blue' is located on the eastern extremity of the village and given its relatively small area it is unlikely to provide a significant recreational opportunity for the village as a whole. As such, I attach limited weight to this.
82. The proposed planting identified in the Green Infrastructure Strategy would provide some benefit in diminishing the 'harshness' of the approach to the village from the east. In addition, the proposed planting would also provide biodiversity benefits. These benefits are afforded moderate weight.

Other matters

83. The Rule 6 party and local residents expressed concerns regarding the effect of the proposal on highway and the free flow of traffic in Stonesfield. However, this matter was not contested by the Council in its decision to refuse planning permission. The Framework advises in paragraph 109 that development should only be prevented on highway grounds if there would be an unacceptable

impact on highway safety, or the residual cumulative impacts on the road network would be severe. OCC, in its capacity as highway authority, is satisfied that the safe access on to Woodstock Road can be made from the site and have not identified that impacts on the road network would be severe. I have no other evidence to suggest that the additional traffic arising from the proposed development cannot be acceptably accommodated on the surrounding highway network. Consequently, whilst I have taken these concerns into account, I have afforded them little weight in my consideration of this appeal.

84. The Rule 6 party also contend that the proposal would be located in a village that is considered to have a limited range of facilities and poor public transport accessibility. The SoCG identifies that the site is reasonably well related to local shops and facilities. Those are identified in paragraph 8.50 of the SoCG. The village is served by a hourly bus service that provides access to Chipping Norton, Woodstock, Kidlington and Oxford. The proposed planning obligation would provide a financial contribution intended to increase the frequency of the bus service. On this basis, both main parties agreed in the SoCG that the village is a suitable location for some new housing development as is reflected in the policies relating to the location of new development set out in the WOLP and explained above in this decision.
85. Although the above matters have been carefully noted, they do not alter the main issues which has been identified as the basis for the determination of this appeal, particularly in circumstances where the Council has not objected to the appeal scheme for these other reasons.
86. The parties in this appeal have referred to many appeal decisions which have been provided to support their respective case. However, it is rarely the case that appeal decisions on other sites will bring to light parallel situations and material considerations which are so similar as to provide justification for a decision one way or another. My decision is based squarely on the evidence before me. For that reason, I do not consider that appeal decisions brought to my attention have a determinative influence on my consideration of the appeal case.

Planning Obligations

87. The Section 106 Agreement between the appellants and OCC includes obligations relating to financial contributions towards 'Early Years' childcare provision in Stonesfield, 'Primary Education' facilities and 'Public Transport' provision to support public transport services serving Stonesfield.
88. The agreement between the appellants and the Council includes obligations requiring that 50% of the dwellings constructed are provided as affordable housing, and financial contributions towards play/recreational areas, public art and sports and recreation facilities.
89. The Council agree that the completed and executed S106 Agreements would resolve its concerns relating to the pressure on the local infrastructure within the district and overcomes the second reason for the refusal of planning permission. There is no substantive other evidence before me which would indicate that the available services and facilities would not have sufficient capacity to accommodate demand arising from the development beyond those that require the provisions of the planning obligation.

90. At the Inquiry the Council and OCC submitted a CIL Compliance Statements. These confirm that none of the obligations would conflict with Regulation 123 requiring that no more than five contributions are pooled towards any one specific infrastructure scheme.
91. Having regard to the above, and based on the evidence before me, I am satisfied that all of the provisions set out in the obligations are necessary to make the development acceptable in planning terms, are directly related to the development and fairly and reasonably related in scale to the development. Therefore, they all meet the tests as set out within paragraph 52 of the Framework and CIL Regulations 122 and 123. I am satisfied with the form, drafting and content of the obligations and therefore I have attached weight to the provisions contained therein in this decision.
92. Stonesfield Parish Council identified concerns at a perceived lack of transparency in how the Council and OCC utilise contributions received from development through planning obligations. In relation to the obligations above, concerns were expressed at the lack of engagement with the Parish Council in discussions regarding the content and financial value of the obligations. Whilst I recognise the Parish Council's role in the community, these concerns are not planning matters relevant to my determination of this appeal and, as such, I have not afforded them any weight in my determination of this appeal.

Planning Balance and whether the development would be appropriately located

93. Paragraph 172 of the Framework provides that great weight should be given to conserving and enhancing landscape and scenic beauty in AONB's which have the highest level of protection in relation to these issues. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.
94. Neither the development plan nor national policy preclude major development in the AONB at Stonesfield. However, to provide exceptional circumstances to overcome the great weight attached to conserving the landscape of the AONB the WOLP, through Policies H2 and BC1, requires that windfall housing proposals on undeveloped land adjoining built up areas will only be supported where there is convincing evidence of a specific local housing need specific to a particular settlement.
95. Notwithstanding the planning background relevant to the site, on close scrutiny of the development before me, I have found that it would cause significant harm to the character and appearance of the AONB. In this respect, it would be contrary to paragraph 172 of the Framework. It would also be contrary to Policies EH1, EH2 and OS1 of the WOLP
96. The appellants have made a case to support their contention that there is both a market and affordable housing need in Stonesfield. Whilst I applaud the level of detail provided this does not meet the stringent requirements of the combination of Policies H2 and BC1 in providing convincing evidence of a specific local housing need specific to the settlement. Consequently, in being in conflict with the requirements of these policies I do not consider that the exceptional circumstances test has been met.

97. The scheme would provide additional benefits which I have outline above and which are afforded moderate to significant weight. However, in finding harm to the character and appearance of the AONB, and the in absence of any convincing exceptional circumstances case being made, these do not outweigh the highest level of protection that the Framework provides to conserving the landscape of the AONB. Consequently, the location of the proposed development would be contrary to the provisions of the development plan. Moreover, the public interest test as identified in paragraph 172 of the Framework is not met.

Conclusion

98. For the above reasons, taking into account the development plan as a whole based on the evidence before me and all other matters raised, I conclude that the appeal should be dismissed.

Stephen Normington

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY

Charles Streeten of Counsel instructed by West
Oxfordshire District Council

He called

Chris Wood BA, Dip TP Senior Appeals Officer, West
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FOR THE APPELLANT

Paul Cairns QC of Queens Counsel instructed by
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He called

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Neil Tiley Assoc RTPI Pegasus Group

David Hutchinson BSc (Hons),
Dip TP, MRTPI Pegasus Group

FOR THE RULE 6 PARTY (STONESFIELD PARISH COUNCIL, SUSTAINABLE STONESFIELD AND COTSWOLDS CONSERVATION BOARD)

Jim Astle Local Resident

He called

Will Harley BSc (Hons), CMLI WHLandscape Consultancy Ltd

John Mills BEng (Hons), MSc
MRTPI Planning and Landscape Officer
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David Illingworth BSc, PhD, Dip TP,
FRGS, MRTPI, CIPFA Local Resident

David Brown Chairman Stonesfield Parish Council

David Morris Chairman Sustainable Stonesfield

INTERESTED PARTIES

Gillian Salway CPRE West Oxfordshire

Sue Haywood Responsible Planning in Burford

David Lines Local Resident

DOCUMENTS SUBMITTED DURING THE INQUIRY

- 1 Statement of Common Ground dated 29 March 2019
- 2 List of suggested planning conditions
- 3 A0 size copy of submitted drawing No 501B (Public Open Space, Detailed Soft Landscape)
- 4 Copy of Judgement [2018] EWHC 1799 (Admin)
- 5 Copy of RPS Landscape and Visual Impact Assessment Preliminary Report
- 6 Copy of missing Appendix 5.1 of Mr Cook's evidence (Drawing No P16-0174_06)
- 7 Copy of The Stonesfield Slate (October 2018)
- 8 Copy of The Stonesfield Slate (November 2018)
- 9 Appendices (RM1 – RM9) of Richard Morris Proof of Evidence
- 10 Appendices (DJB1 – DJB20) of David Brown Proof
- 11 Review of CBA Report 'Recommendations for Land north of Woodstock Road, Stonesfield' by Will Harley (November 2007)
- 12 Transcript of Appellant's Opening Statement
- 13 Transcript of Council's Opening Statement
- 14 Transcript of Rule 6 Party Opening Statement
- 15 Draft S106 Agreement (West Oxfordshire District Council)
- 16 Draft S106 Agreement (Oxfordshire County Council)
- 17 Errata/Update to Proof of Evidence of Neil Tiley
- 18 Plan showing Landscape Character Types – West Oxfordshire Landscape Assessment (1998) (Drawing No P16-0174_12)
- 19 Spreadsheet extract from Homeseeker Plus Database showing applicants who have expressed a desire for affordable housing in Stonesfield
- 20 Email dated 19 March 2019 confirming appellant's intent to undertake a public consultation on landscaping proposals
- 21 Transcript of Statement read by Gillian Salway
- 22 Transcript of Statement read by Sue Haywood
- 23 Transcript of Statement read by David Lines
- 24 Copy of Homeseeker Plus Policy 24
- 25 Plan illustrating suggested route and viewpoints for unaccompanied site visit
- 26 Signed and dated S106 Agreement (West Oxfordshire District Council)
- 27 Signed and dated S106 Agreement (Oxfordshire County Council)
- 28 Comments submitted by Mr Brown, Chair of Stonesfield Parish Council with regard to planning obligations
- 29 Copy of Appeal Decision APP/D3125/W/18/3202562
- 30 Oxfordshire County Council CIL Regulation 123 Compliance Statement
- 31 Oxfordshire County Council CIL Regulation 122 Compliance Statement
- 32 West Oxfordshire District Council CIL Regulation 122 and 123 Compliance Statement
- 33 Closing submissions by West Oxfordshire District Council
- 34 Closing submissions by Rule 6 Party
- 35 Closing submissions by appellant

DOCUMENTS SUBMITTED AFTER THE INQUIRY (Following discussion and agreement during the Inquiry)

- 36 Updated and agreed list of suggested planning conditions dated 16 May 2019, including the appellant's consent to suggested pre-commencement conditions

Appendix 9 Extracts from Buckinghamshire Green Infrastructure Delivery Plan, 2013



Buckinghamshire Green Infrastructure Delivery Plan

Final Report | August 2013

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Acknowledgements:

First phase consultation (2012)

Development of this Green Infrastructure Delivery Plan was guided by a steering group comprising of Sandy Kidd and Andy McVeigh of Buckinghamshire County Council, Heather Lewis (Berkshire, Buckinghamshire and Oxon Wildlife Trust), Alison Futter/Sarah Jane Scott (Environment Agency), Sarah Wright (Natural England), Lesley Davies (Aylesbury Vale District Council), Simon Gray (South Bucks District Council), David Waker (Chiltern District Council) and Haidrun Breith/Lesley Stoner (Wycombe District Council).

Second Phase consultation (2013)

Wider consultation was co-ordinated by Vicky Wetherell, Green Infrastructure Officer at Buckinghamshire County Council and was undertaken with the former membership of the Buckinghamshire Green Infrastructure Consortium with detailed contributions from district and county councils.

Authorship:

The GI Delivery Plan was written by LUC in consultation with the steering group. LUC's team comprised Kate Ahern, Robert Deane, Andrew Tempany, Alex Massey, Louise Tricklebank, Kate Milner, Matthew Tickner, Matthew Parkhill, Fearghus Foyle and James Hartwell, working with Andrew Kirk of Heritage Cost Consultants. In addition, consultation was undertaken with a range of stakeholders, whose contributions are gratefully acknowledged.

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Executive summary

This Green Infrastructure Delivery Plan builds on the strategic green infrastructure (GI) planning framework which has been developed in Buckinghamshire since 2009 (Buckinghamshire GI Strategy 2009¹, Aylesbury Vale GI Strategy 2011-2026², plus GI and open space planning work undertaken in the other districts within the county).

The earlier strategic work and this plan recognise the enormous diversity, quality and often high sensitivity of green infrastructure assets across the county, and the need to plan effectively for their conservation in the face of change and growth, and for future GI provision to complement and relieve pressures on existing GI assets. The plan also recognises and seeks to positively work with, the diverse range of positive GI initiatives already in operation across Buckinghamshire.

This document has been developed in parallel with work to enable the Buckinghamshire and Milton Keynes Natural Environment Partnership (Local Nature Partnership or NEP) which was set up from 2011 and comprised members of the Buckinghamshire Green Infrastructure Consortium and Buckinghamshire and Milton Keynes Biodiversity Partnership. The GI Delivery Plan identifies a suite of area specific GI proposals and projects within the strategic GI framework, which the NEP can begin taking forward with other key stakeholders. It also provides guidance on how these can be achieved, plus notes on synergies with other complementary projects, potential funding streams and governance models.

The process undertaken in developing this plan is described in more detail in subsequent sections of the document. Broadly, it encompassed review and understanding of the strategic GI context and scoping of a long list of known GI initiatives and project proposals to evaluate and identify potential areas of focus for more detailed, areas specific GI proposals. These were worked up in consultation with the steering group and other stakeholders. A profile has been compiled for each selected area within the plan, setting out strategic context, spatial opportunity and need analysis, plus proposals and supporting schedules of actions and broad capital costs. Advice is also provided on funding streams and governance models, plus ownership and review of the plan.

The document sets out a suite of spatial proposals and potential projects for the newly formed NEP as it goes forward in the future.

¹ Buckinghamshire Green Infrastructure Consortium, 2009, Buckinghamshire Green Infrastructure Strategy

² Buckinghamshire Green Infrastructure Consortium, BCC, AVDC, Aylesbury Vale Advantage, Environment Agency, 2011, Aylesbury Vale Green Infrastructure Strategy 2011-2026

3 Strategic GI projects in Buckinghamshire – the long list

- 3.1 This section introduces and updates the long list of strategic scale GI projects set out in the county GI strategy, component district GI strategies and projects by other relevant partners, identified by the steering group. It should be noted that the strategic projects do not cover Milton Keynes District, since these are the subject of a separate GI Plan.
- 3.2 The strategic GI context is shown on **Figure 3.1**, at right. This illustrates the key GI corridors plus GI Priority Action Areas defined in the county GI Strategy, plus strategic project proposals identified in that document, district level GI strategies and in work of other relevant partners such as the Chilterns Conservation Board, Chiltern Society, Canal & River Trust and Buckinghamshire, Berkshire and Oxon Wildlife Trust (BBOWT). This long list of project proposals is summarised in **table 3.1** overleaf and mapped where possible on **Figure 3.1**.
- 3.3 Much has changed since these projects were defined, not least the spatial planning and economic agendas. The long list projects are however still relevant, and this relevance is heightened as pressures increase on sites, with attendant need for sites to perform multiple green infrastructure functions in the face of competition for limited resources. Green infrastructure will also be able to make an important contribution to economic regeneration, whether in the form of employment, job creation, volunteering opportunities, or opportunities for tourism and revenue generation.
- 3.4 In some cases, long list sites and proposals will need added infrastructure to boost their tourism potential, for example provision of facilities such as tourist information centres, cafes, public conveniences and changing facilities/equipment hire. Whilst such considerations are beyond the realms of this plan, consideration is given in general terms to where upgrades to the tourism infrastructure would be of benefit (marked with a 'T' on the project list overleaf).

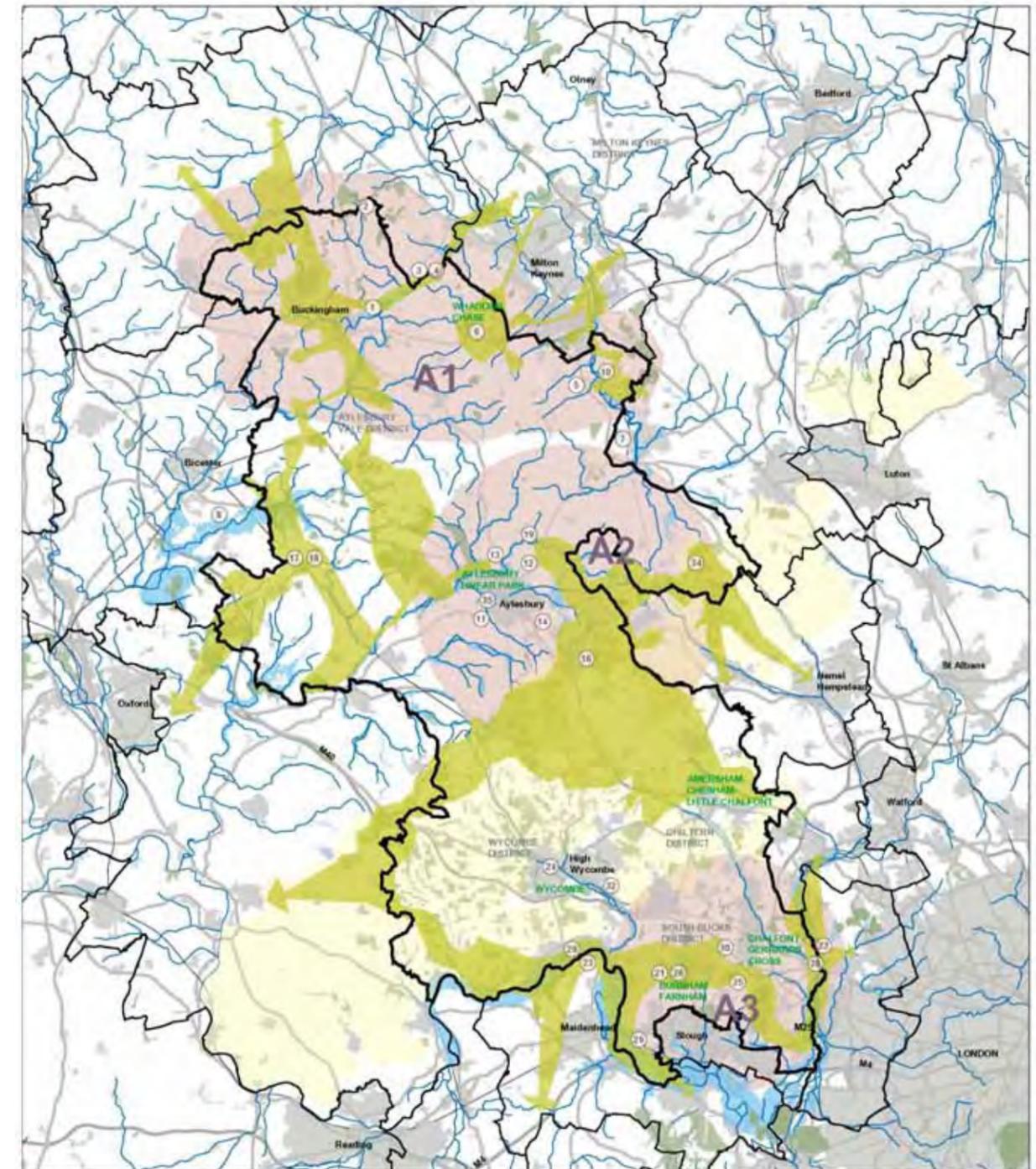


Figure 3.1: Strategic GI Context

4 Generating a shortlist for area proposals

- 4.1 The long list information, consultation with the client and the GIS functional opportunity analysis has been used to generate a shortlist of six locations for area specific GI proposals for this plan. These are where the analysis and consultation has indicated a need for more detailed area specific proposals within the strategic GI framework. These areas are set out, with rationales, in **table 4.1** below.

Table 4.1: Foci for area specific GI proposals in this plan

Location	Rationale
Amersham-Chesham-Little Chalfont	The area does not fall within a Priority Action Area. However, it forms part of an identified key GI area corridor (Chess Valley, a primary accessible GI resource in close proximity to two significant areas of population – market towns of Amersham and Chesham, and forming an important part of their landscape setting). The Chess Valley outside the areas of settlement falls within the Chilterns AONB and is covered by the Chalk Streams project. It is also identified in the Environment Agency’s (EA) Water Framework Directive as being at risk of low flows due to abstraction pressures. The ecological quality and sensitivity is recognised through the identification of the Chess as a Biodiversity Opportunity Area (BOA). The sensitivity and quality of the landscape surrounding the town towns is also important in respect of potential settlement fringe growth. Chesham has significant health deprivation issues, partly exacerbated by settlement form and density and barriers to accessing the GI network (transport barriers). Little Chalfont and Amersham-on-the-Hill have a notable settlement scale GI network associated with their Metroland origins.
Aylesbury Linear Park (includes a number of flagship GI projects: Aylesbury Linear Park east and west and Quarrendon Leas to the West and Grand Union Triangle, Wendover Woods and Regional Wetland Park to the east)	Part of the ‘Area Around Aylesbury’ GI Priority Action Area 2 in the County GI Strategy. Selected due to large scale planned and part implemented growth (developer led GI through development at Berryfields and Aylesbury East) and the fact that the area around Aylesbury is already the focus for many positive strategic GI proposals – Linear Park, Quarrendon Leas, Regional Wetland Park, Grand Union Triangle, plus Vale Park and thematic projects such as ‘Trees Please’ in the Aylesbury Vale GI Strategy. A number of these address the strategic ANGSt deficits identified in the county GI Strategy (e.g. Quarrendon Leas, Wendover Woods). Deficit continues to be experienced at the district ANG level and this should be a focus for future urban GI planning. The area is linked into key GI area corridors via the River Thame, plus Grand Union Canal corridors and foothills/scarps of the Chilterns to the east, which include strategic accessible natural green space (ANG) resources which are the focus of strategic projects e.g. Wendover Woods. BOAs at Thame Valley and Wendover Woods.

Location	Rationale
Burnham-Farnham	Part of the Wycombe South Bucks GI Priority Action Area 3 and also within a key GI corridor. The area has been selected partly on the basis of close proximity and links to large urban centres – Slough and Greater London. Primary foci in the proposals area are Burnham Beeches and Stoke and Littleworth Common SSSI’s, also part of the wider South Bucks Heaths and Parklands BOA. Key accessible GI asset in proximity to key area of population and area of deprivation at Slough. Access links are variable. The area was also selected due to consideration and mitigation of small scale settlement edge developments in relation to historic landscape assets such as the Beeches and parklands in this area.
Chalfont-Gerrards Cross	Part of the Wycombe South Bucks GI Priority Action Area 3 and also within a key GI corridor. Falls within key GI area corridor associated with the Colne Valley and the Colne Valley Regional Park. The settlements of the Chalfonts and Gerrards Cross form significant centres of local population in the M40 and M25 corridors and the Colne Valley is a primary GI asset in proximity to these centres, which would benefit from enhanced links and profile – a key reason for this area’s selection. The Colne Valley is also focus for a BOA of the same name. In common with Amersham-Chesham-Little Chalfont, the area also has a distinctive settlement scale green space resource associated with Metroland built heritage.
Whaddon Chase	Within the North Aylesbury Vale GI Priority Action Area 1. Selected for its GI potential in proximity to the City of Milton Keynes. Whaddon Chase is also the focus of a strategic project in the County GI Strategy and is a sensitive GI resource in proximity to the urban area and potential growth sites west of Milton Keynes (need for mitigation/ANG provision). Also a BOA.
Wycombe	Area has links to the Thames Key GI corridor to the south via Little Marlow Gravel Pits and Daws Hill which forms the town’s southern hinterland. Also partly within the Wycombe and South Bucks GI Priority Action Area 3. The town is fringed by many sensitive landscape and historic environment assets including registered parklands and the Chilterns AONB. Urban area forms part of the focus of the ‘Revive the Wye’ initiative to restore and enhance the channelised/culverted river, and give greater expression to urban GI in Wycombe.

5 Presentation of the area specific proposals

5.1 The remainder of this plan presents the proposals for each of the six priority areas. Each area profile is presented in the following format:

- Introduction and strategic context – sets out relationship to strategic GI and other relevant initiatives
- GI spatial and opportunity analysis by function – with supporting mapping of each of the 7 functions, describing existing provision, issues, needs and opportunities. In some cases these present many ideas which could form the basis of GI proposals in future, although a streamlined approach has necessarily been taken to proposals for the purposes of this plan
- GI objectives – the main, high level messages from the analysis, to inform proposals
- Area GI proposals map
- GI proposals schedule – cross referenced to the proposals map for each area

Amersham-Chesham-Little Chalfont



Amersham-Chesham-Little Chalfont

5.2 The adjoining valley floor market towns of Amersham and Chesham are located in Chiltern District, associated respectively with the Misbourne and Chess River Valleys. The proposals area includes the two settlements plus the Metroland towns at Amersham on the Hill and Little Chalfont, and parts of the two river valleys within a 2km settlement envelope. This includes historic landscape such as Shardeloes Park in the Misbourne Valley and a distinctive series of riparian landscapes and habitats including watercress beds and lowland wet woodland. The rural landscapes to the west and south of the settlements forms part of the Chilterns Area of Outstanding Natural Beauty (AONB).



Left to right: Chess Valley, urban Metroland green space at Amersham on the Hill, urban stretch of the Misbourne at Amersham.

Strategic context

5.3 The proposals area takes account of the following strategic aspects of GI, identified in the county GI strategy of 2009 and shown on the inset map below.



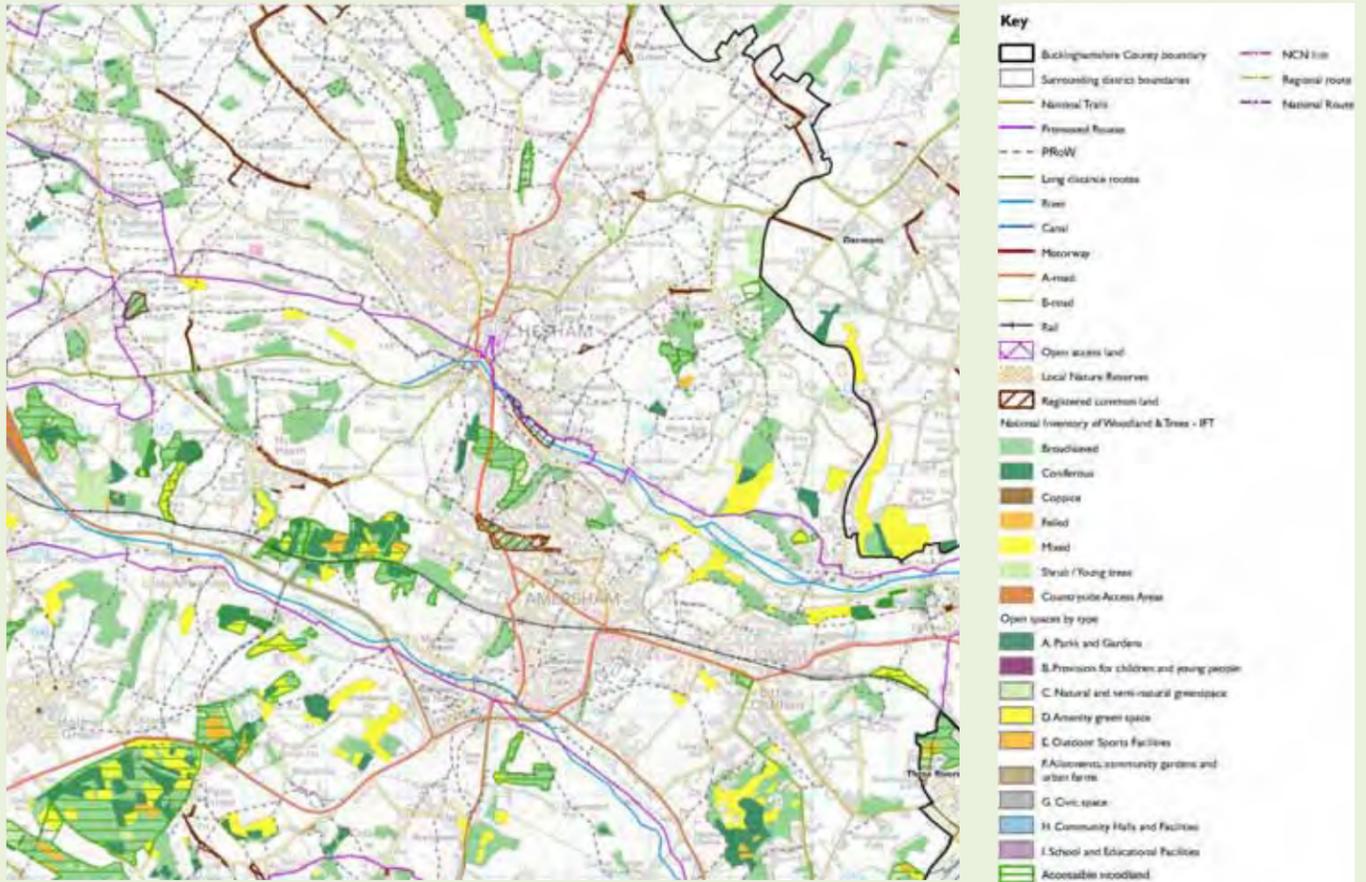
Context (refer to Figure 3.1)

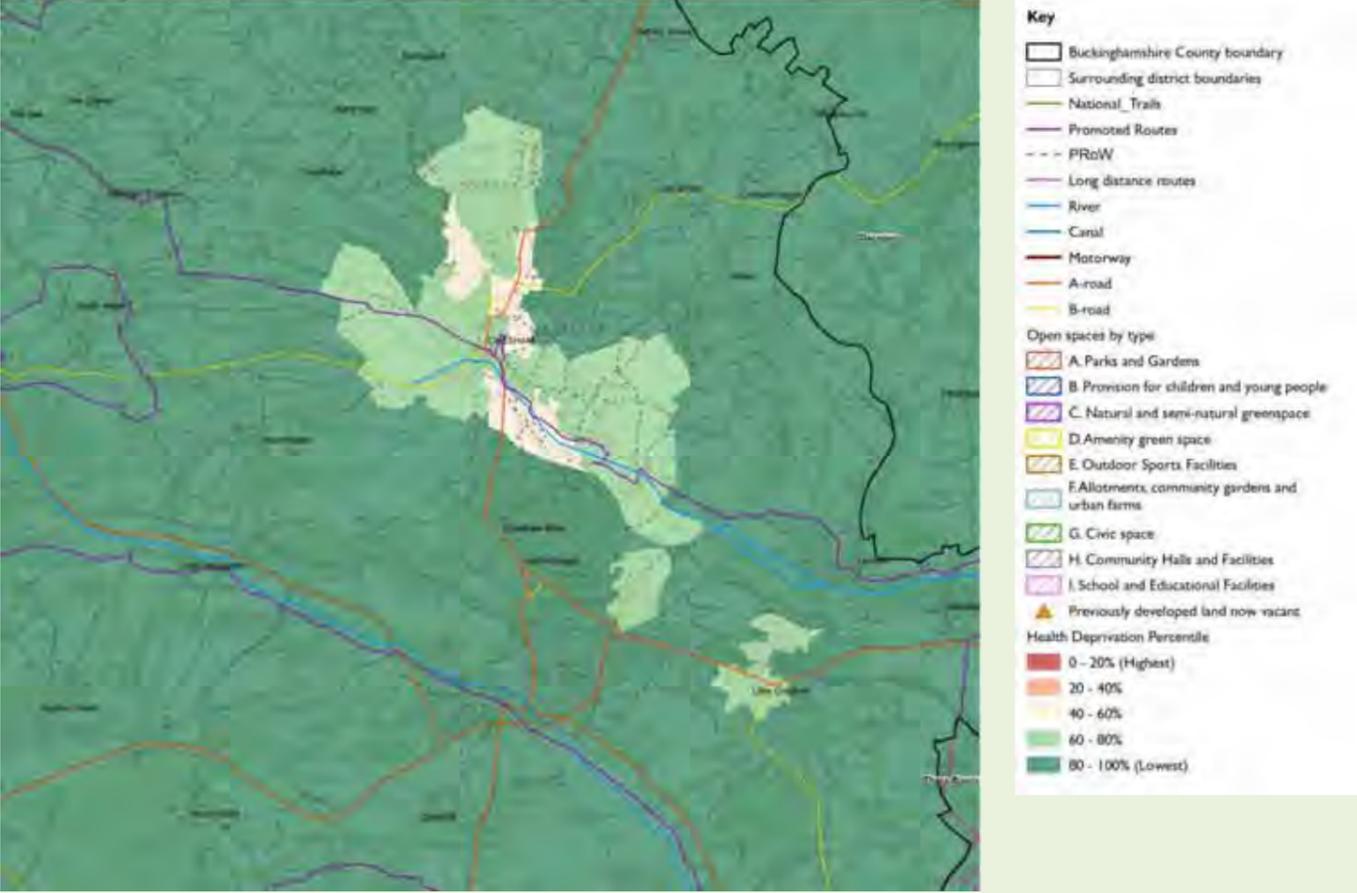
- 5.4 A large part of the proposals area associated with the Chilterns AONB and the Chess falls within a Buckinghamshire Green Infrastructure corridor as identified in the County GI Strategy. As such it is also washed over by strategic GI initiatives supported by the Chilterns Conservation Board (projects such as chalk woodlands and grasslands projects and the Chalk Streams project which covers the Chess Valley). The proposals area does not fall within one of the County GI priority areas or supporting Countryside Access Gateways, however the proximity to the AONB and attendant GI resources accords it strategic significance in view of the quality and sensitivity of the surrounding landscape and natural environment. Chesham also includes relatively substantial areas of health deprivation – potential focus for GI interventions.
- 5.5 No specific GI priorities are identified at district level although the Chiltern District Adopted Core Strategy, which forms part of the emerging Local Development Plan, include a specific policy for the conservation, provision and monitoring of GI (Policy CS32).
- 5.6 High level analysis of urban green infrastructure in the proposals area indicates the following. A need for enhanced legibility of green space access links in traditional town cores such as Chesham and Old Amersham, especially given their close proximity to key resources such as the river valleys. Amersham on the Hill would benefit from enhancement of existing green spaces in the town to reference its Metroland 'garden suburb' historic character (enhanced avenue tree planting referencing the Amersham on the Hill Regeneration Master Plan's 'green spine', plus enhanced management of existing pocket green spaces to improve their biodiversity/garden suburb character). These principles also apply to the other Metroland settlement at Little Chalfont.

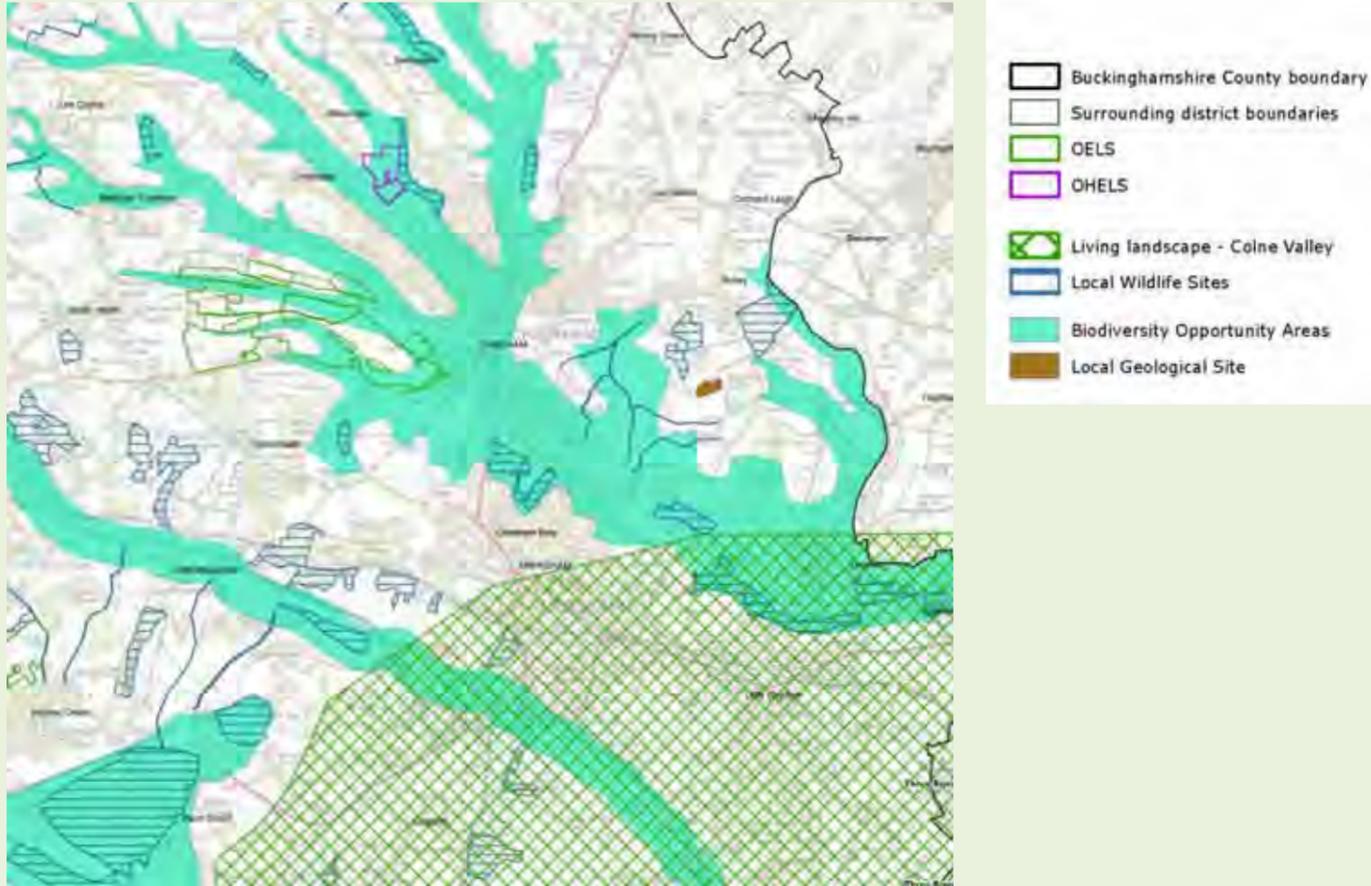
GI spatial and opportunity analysis

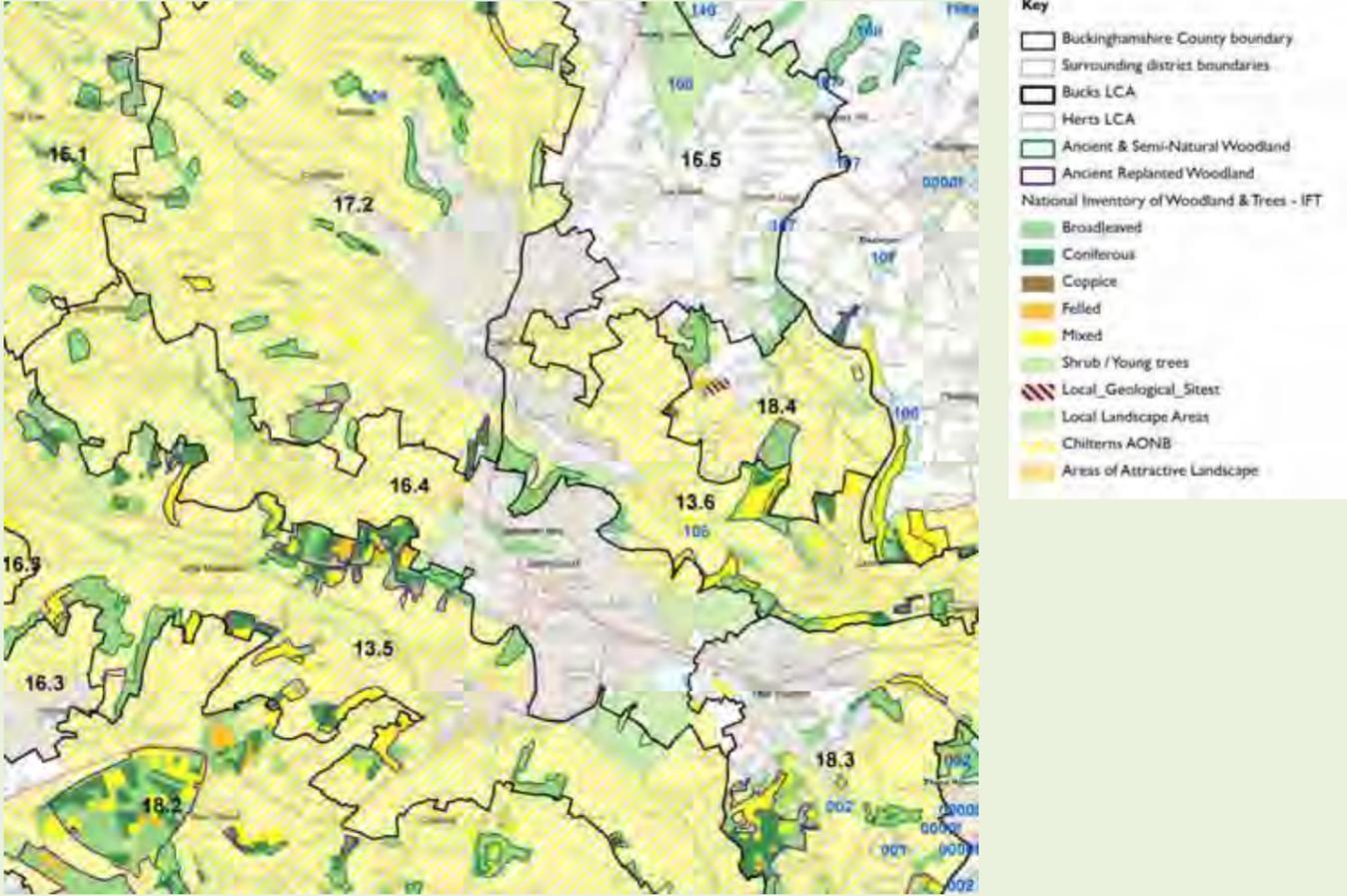
- 5.7 This has been undertaken with reference to the GI functions identified in **section 2** of this GI Delivery Plan. Key findings are set out by function, with supporting mapping, overleaf. The main messages from this analysis have been drawn together into a short set of objectives which frames the GI proposals for the area.

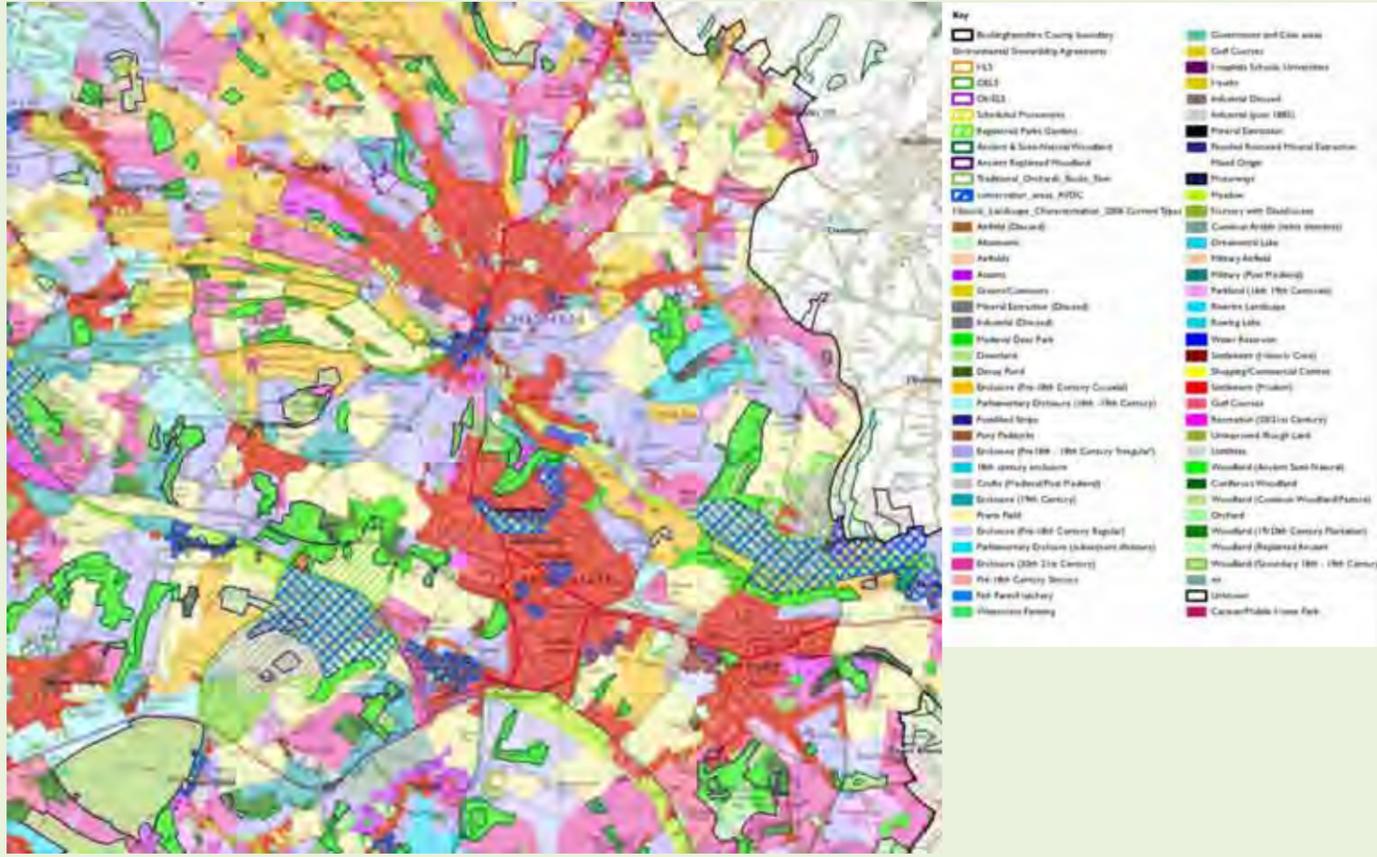
Opportunity analysis by function

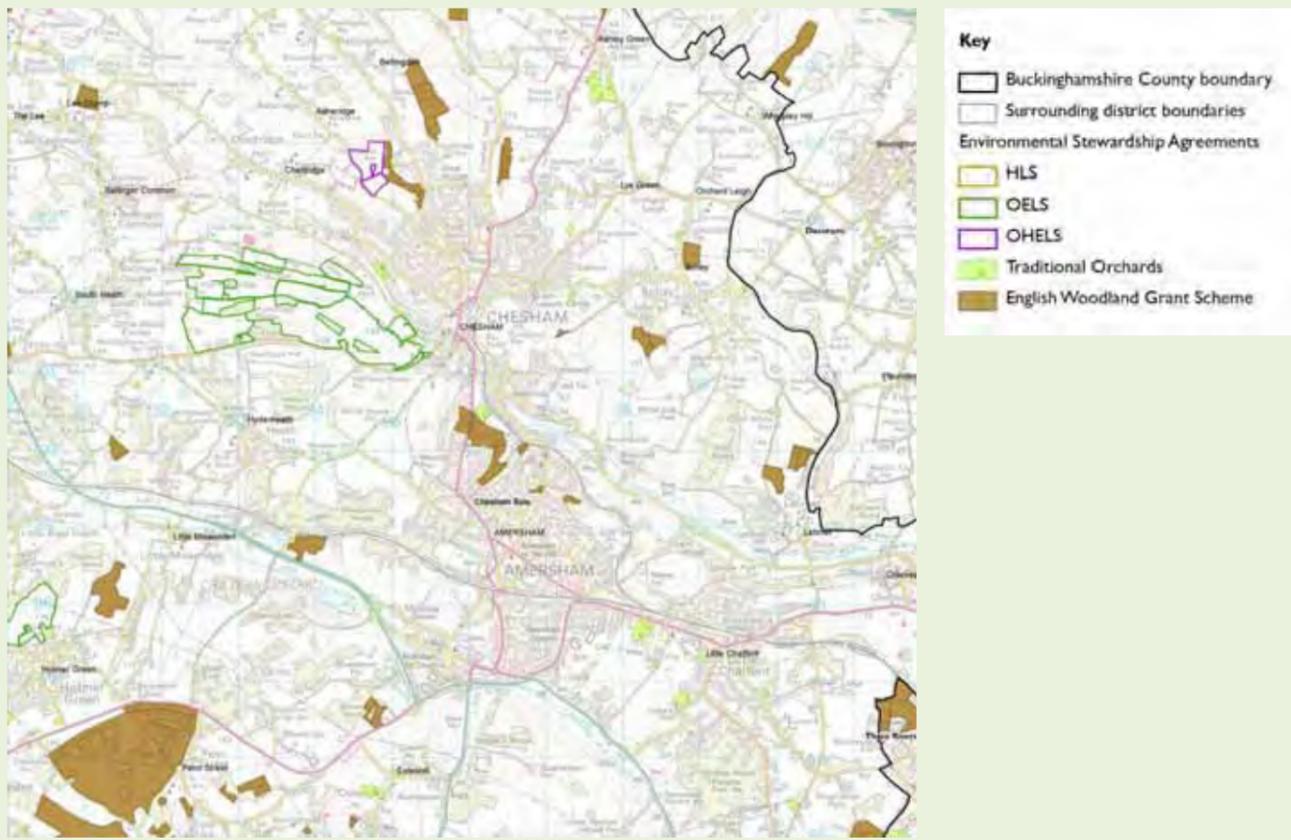
Function	Key issues and opportunities	Data sources used
 <p data-bbox="172 672 430 735">Access links and access to recreation</p>	<p data-bbox="489 346 1261 378">Mapping of key data for Access links and access to recreation</p>  <p data-bbox="489 1333 1291 1365">Analysis of the mapping and data sources reveals the following:</p> <ul data-bbox="519 1375 1869 1669" style="list-style-type: none"> • The Amersham-Chesham-Little Chalfont area is well catered for in terms of ANG provision at the county (100a) level as it falls within the catchment of both Ashridge and Burnham Beeches. Pockets of ANG deficiency are found at the district level (20ha site) north of Chesham, although much of the area is otherwise well provided for due to the Chess Valley and attendant riparian green space. Quantitative provision is therefore broadly adequate, with the issues relating mainly to quality and accessibility of links from the urban centres. • Chesham and Amersham have a good lateral network of promoted routes along the Chess and Misbourne Valleys respectively, although there appears to be an issue with riparian access and perception of links in the settlements, with variable lateral links down to river valleys and associated paths. Chesham has a number of promoted walking routes (http://www.chilternsociety.org/shop-leaflets.php). 	<ul data-bbox="1944 346 2804 808" style="list-style-type: none"> • Buckinghamshire County Green Infrastructure Strategy • ANGSt Assessment produced for the county GI Strategy • Local Transport Plan (LTP3) • Chiltern District Local Development Plan Core Strategy • Open space assessment data/open space typologies • Promoted routes, cycleways and Paths and Rights of Way (PROW) data, national and local cycle routes • Barriers to access: Highways and railways data • Open access land, countryside access areas, common land and accessible woodland inventory data • Information gathered from field survey

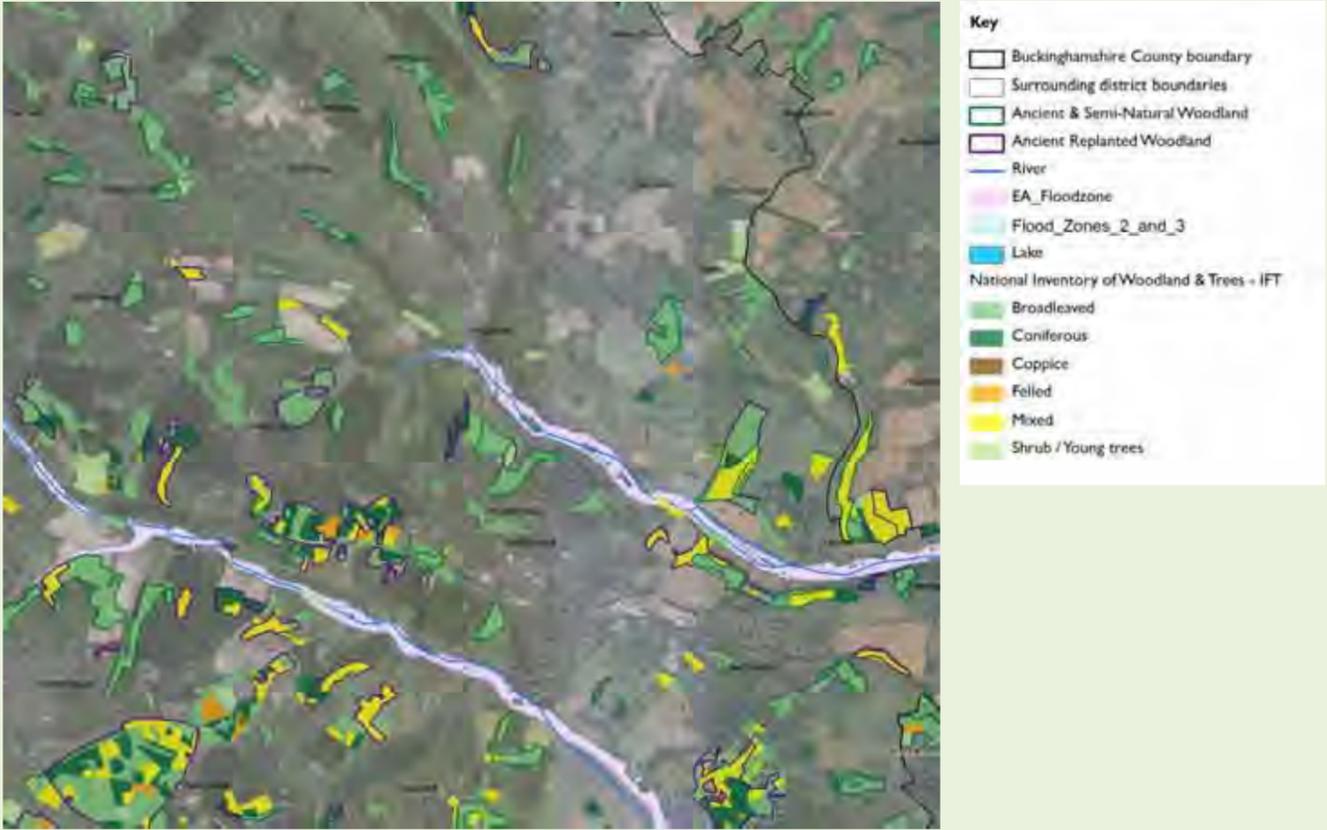
Function	Key issues and opportunities	Data sources used
 <p>Environments for health</p>	<p>Mapping of key data for Environments for health</p>  <p>Analysis of the mapping and data sources reveals the following:</p> <ul style="list-style-type: none"> The key issue is health deprivation in Chesham, with large parts of the urban area in the 40-60% health deprivation percentile. This appears to be partly due to severances created by urban and transport layout – barriers to access. Principal GI opportunities relate to improved signage and promotion of existing routes such as from the tube station at Chesham. 	<ul style="list-style-type: none"> Indices of Multiple Deprivation (IMD) – Health deprivation Promoted routes, cycle ways and Paths and Rights of Way (PROW) data Local Transport Plan LTP3 Barriers to access: Highways and railways data Information from field survey

Function	Key issues and opportunities	Data sources used
 <p data-bbox="172 506 463 590">Conserving and enhancing biodiversity and access to nature</p>	<p data-bbox="486 220 1555 247">Mapping of key data for Conserving and enhancing biodiversity and access to nature</p>  <p data-bbox="486 1203 1299 1230">Analysis of the mapping and data sources reveals the following:</p> <ul data-bbox="528 1249 1846 1501" style="list-style-type: none"> • A rich biodiversity resource is associated with both river valleys (Chess and Misbourne - chalk streams and associated habitat). Both river valleys fall within the Central Chilterns Rivers Biodiversity Opportunity Area (BOA), with the Chess also forming a BOA in its own right. The Misbourne is also part of the adjacent Hertfordshire and London Wildlife Trust's Colne and Crane Valley Living Landscape Area – aims for enhanced landscape and habitat connectivity. • Main opportunities relate to conservation and enhancement of the existing riparian GI resource, also seeking to enhance the quality of the upper valley landscapes (fringe farmland) towards the settlements, to improve biodiversity connectivity in proximity to the towns. 	<ul data-bbox="1941 220 2778 443" style="list-style-type: none"> • Relevant Biodiversity Opportunity Area profiles • Nature conservation designations (international/national/local) and relevant citations • Data on sites positively managed through agri-environment schemes such as Higher Level Stewardship (HLS) • Information from field survey

Function	Key issues and opportunities	Data sources used
 <p data-bbox="172 506 359 533">Sense of place</p>	<p data-bbox="489 222 982 249">Mapping of key data for Sense of place</p>  <p data-bbox="489 1205 1299 1232">Analysis of the mapping and data sources reveals the following:</p> <ul data-bbox="537 1251 1872 1650" style="list-style-type: none"> • A key consideration in creating connected habitats and landscapes as part of the local GI network is the relationship of this to landscape character and sense of place, due in large part to much of the rural landscape outside the settlement falling within the Chilterns AONB. • Relevant landscape character areas and objectives in the Chiltern District LCA are as follows: <i>Upper Misbourne Chalk Valley</i> – important aims are to conserve small scale riparian character, valley archaeology, historic parklands and settings. <i>Chess Chalk River Valley</i> – important aims are to conservation of panoramic cross valley views, conservation of valley archaeology/historic elements, conservation and enhancement of ecologically important riparian habitat, plus enhancing landscape connectivity/pattern where lost. <i>Hyde Heath Settled Plateau</i> – key aims are to conserve and manage woodland and hedgerows for connectivity and enclosure, to conserve archaeology and monuments and to maintain the open countryside between Amersham and Hyde Heath. <i>Bellingdon Dipslope with dry valleys</i> – key strategic objectives are to conserve the small areas of woodland for their contribution to landscape pattern and connectivity. Also to conserve and manage the hedgerow network, maintain open views across the landscape and conserve historic field patterns. 	<ul data-bbox="1947 222 2807 489" style="list-style-type: none"> • Chilterns AONB Management Plan • Chiltern District Landscape Character Assessment (LCA) and supporting datasets • Ancient woodland inventory data • Data on landscapes positively managed through land management schemes e.g. Higher Level Stewardship (HLS) • Information from field survey

Function	Key issues and opportunities	Data sources used
 <p data-bbox="172 478 463 596">Conserving, enhancing and understanding historic character</p>	<p data-bbox="486 218 1561 247">Mapping of key data for Conserving, enhancing and understanding historic character</p>  <p data-bbox="486 1159 1299 1188">Analysis of the mapping and data sources reveals the following:</p> <ul data-bbox="528 1205 1875 1801" style="list-style-type: none"> Numerous historic GI assets are associated with the river valleys, the Chess in particular - prehistoric archaeology, medieval settlement and mills, valley side parklands. Many of the Chess's assets are well recognised and promoted e.g. Chess Valley Walk and associated trails. The Misbourne also presents an opportunity in this regard. The Buckinghamshire HLC identifies some historic landscape types likely to be significant (opportunity for conservation as part of the GI network) e.g. co axial field systems in the ridges and valleys west of Chesham and along the Chess Valley north of Amersham, plus areas of pre 18th century Enclosure on upper valley slopes in the Chess Valley. Many of the woodland sites on the ridgetops around Chesham, and at Shardeloes and overlooking the Chess are Ancient Woodlands, although few appear to be managed through land management schemes such as HLS. The Chess has a network of historic, registered parklands e.g. Latimer, Chenies and associated historic features in the valley floor including estate villages (Conservation Area). In the Misbourne west of Amersham, Shardeloes Park (GII* registered) and house are prominent designated features, with the setting partly compromised by the A413. Amersham on the Hill and Little Chalfont have a highly distinctive Metroland heritage and low density garden suburb type layout in place, developed in accordance with early 20th century Garden City ideals (cf. Amersham Action Group Regeneration Master Plan and opportunities to celebrate Metroland heritage through GI proposals such as urban greening through new avenue tree planting). 	<ul data-bbox="1941 218 2825 546" style="list-style-type: none"> Buckinghamshire Historic Landscape Characterisation Heritage designations and relevant citations (Registered Parks and Gardens, Sites on the Sites and Monuments Record – SMR/SAM) Ancient woodland inventory (AWI) data, plus data on AWI sites which are positively managed through English Woodland Grant Scheme (EWGS) take up – Higher Level Stewardship (HLS) Information from field survey Amersham Action Group Regeneration Master Plan for Amersham on the Hill

Function	Key issues and opportunities	Data sources used
 <p data-bbox="172 535 400 598">Productive green environments</p>	<p data-bbox="489 220 1202 252">Mapping of key data for Productive green environments</p>  <p data-bbox="489 1155 1291 1186">Analysis of the mapping and data sources reveals the following:</p> <ul data-bbox="519 1197 1869 1627" style="list-style-type: none"> • Aspects of historic environment and legacy are also associated with productive green environments, with a notable distribution of historic water cress beds and traditionally managed orchards in the valley landscapes. These provide opportunities for further local food production and potential links into local partnerships such as Colne Valley Food. • Principal existing assets are represented by swathes of organically farmed land in the co axial field systems west of Chesham, areas of WGS woodland on the ridges and at Chesham Bois. Also a scattering of traditionally managed orchards, primarily in the Chess Valley, on the edge of the plateau towards Bovingdon, at Chesham Bois and between Amersham/Little Chalfont. • Traditionally managed orchards, along with historic landscape types such as watercress beds may be able to provide a focus for landscape enhancement in both the Chess and the Misbourne, through take up of land management initiative such as Higher Level Stewardship (HLS). The Chesham area was historically famous for its orchards including the Carroon Cherry. The nearby 'Cherry Pie Villages' were a popular tourist destination in the inter war years. 	<ul data-bbox="1944 220 2819 367" style="list-style-type: none"> • Allotments data from Open Space studies • Data on traditionally managed orchards from Natural England • Data on organically managed farmland (Organic Entry Level Stewardship or OELS)

Function	Key issues and opportunities	Data sources used
 <p>Facilitating climate change adaptation; sustainable water/floodrisk management</p>	<p>Mapping of key data for Facilitating climate change adaptation; Sustainable water/floodrisk management</p>  <p>Key</p> <ul style="list-style-type: none"> □ Buckinghamshire County boundary □ Surrounding district boundaries □ Ancient & Semi-Natural Woodland □ Ancient Replanted Woodland — River □ EA Floodzone □ Flood_Zones_2_and_3 □ Lake National Inventory of Woodland & Trees - IFT <ul style="list-style-type: none"> □ Broadleaved □ Coniferous □ Coppice □ Felled □ Mixed □ Shrub / Young trees <p>Analysis of the mapping and data sources reveals the following:</p> <ul style="list-style-type: none"> Principal areas of woodland distribution are on the ridge tops associated with the intricate dry valley system which forms the landscape setting to Chesham, at Chesham Bois and on the slopes overlooking the Chess and Misbourne Valleys. This woodland distribution is however not uniform and there may be an opportunity to link woodland to provide water run off catchment/attenuation function in relation to urban sections of the Chess and Misbourne floodzones. Both settlements enjoy a reasonable level of tree cover (leafy suburbs, back gardens to historic town cores). This is particularly the case in Amersham on the Hill and Little Chalfont (essentially Metroland Garden suburbs), although Amersham on the Hill town centre, principal shopping streets and associated public realm present an opportunity to increase tree cover (Cf. Amersham Regeneration Master Plan). The Chess is identified by the EA Water Framework Directive (WFD) data as being at risk of low flows due to over abstraction, whilst the Misbourne is probably at risk and defined by heavily modified morphology. The abstraction and low flow vulnerabilities of the Chess in particular are noted, indicating a possible requirement for areas of alternative wetland habitat creation in the valley. Opportunities in terms of flood risk management relate to connectivity of features such as woodland wildlife sites, to assist with water run off catchment. 	<ul style="list-style-type: none"> Catchment Flood Management Plans (CFMPs) Buckinghamshire County Council Preliminary Flood Risk Assessment Strategic Flood Risk Assessment (SFRA) data EA Floodplain data Chesham Draft Surface Water Management Plan EA Water Framework Directive (WFD) data where available National Woodland Inventory data

GI objectives for Amersham:

Chalk landscapes and Metroland Links: Providing enhanced physical access, landscape and habitat connectivity to the principal chalk valleys, and to enhance the landscape setting of the settlements/protect valley landscapes.

The GI proposals which respond to the analysis and objectives above are set out overleaf.

① Conserve historically important co-axial field patterns west of Chesham (encourage extension of existing stewardship take up including organic stewardship)

② Enhanced native woodland linkages to ridges to provide landscape/habitat connectivity and enhance settlement setting (through High Level Stewardship/Woodland Grant Scheme take up)

③ Native woodland linkage to provide definition to valley landform / landscape enhancement and assist with run off catchment

④ Abstraction vulnerable chalk valleys: Wetland conservation and enhancement in the Chess and Misbourne including creating expanded and more flexible range of habitats such as wet meadow and chalk grassland (link to AONB Chalk Streams projects delivered in Chesham and downstream at Sarratt)

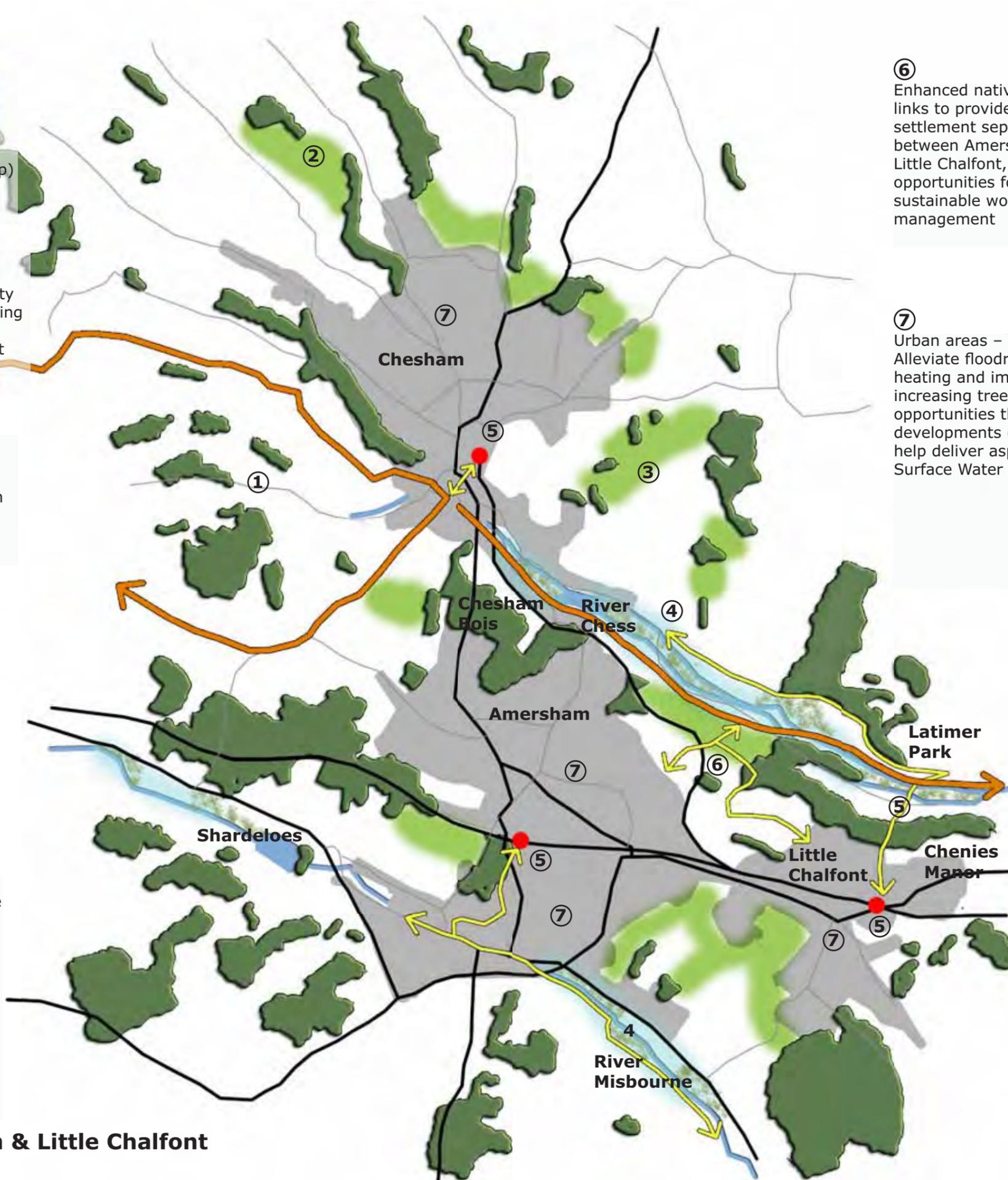
⑤ Improved signage and links from the tube stations to the river valleys as principal GI assets - reinforce 'Metroland' identity as gateway to countryside plus improved links to Chess Valley from Latimer. Aspiration for as many access links as possible to be shared use, this could also apply to the wider PROW network

⑥ Enhanced native woodland links to provide settlement separation between Amersham and Little Chalfont, plus opportunities for sustainable woodland management

⑦ Urban areas - 'Greening the town': Alleviate floodrisk, combat urban heating and improve green links by increasing tree cover and by taking opportunities through new developments (e.g. green roofs) to help deliver aspects of the Chesham Surface Water Management Plan

Key

-  Transport barriers
-  Station
-  Settlements
-  Existing woodlands
-  Existing hydrology
-  Existing strategic access links
-  Proposed access links
-  Proposed habitat connectivity
-  Proposed wetland enhancement
-  ① Proposed spatial projects



Amersham, Chesham & Little Chalfont Area GI Proposals

Amersham-Chesham-Little Chalfont: GI Proposals Schedule (to be read in conjunction with the GI proposals plan on the preceding page)

Project No/Name and GI functions delivered	Location/area	Project status/next steps	Project lead/owner	Delivery body/organisation	Associated programmes and partnerships	Total cost (cost band/range)	Timescale/phasing	Long term management and governance
<p>1. Conserve historically important co axial field patterns west of Chesham</p> <p>GI functions potentially delivered:</p> <ul style="list-style-type: none"> • Sense of place • Biodiversity • Conserving, enhancing and understanding historic character 	Historic pre 18 th century field systems identified by the Buckinghamshire HLC west of Chesham	Historic landscape type identified as important by the Bucks HLC, although currently little means of formal protection. Need for enhanced take up of positive land management schemes such as Higher Level Stewardship (HLS).	NEP – liaison with relevant landowners and Natural England to facilitate enhanced take up.	Natural England, landowners.	Natural England’s Higher Level Stewardship (HLS) programme.	Potentially covered in HLS grant – see schedule of rates in Appendix 2.	During the next phase of HLS agreements from 2013.	Through the Farm Environment Plans and associated schedule of actions which are required to release HLS grant funding.
<p>2, 3, 6. New native woodland links</p> <p>GI functions potentially delivered:</p> <ul style="list-style-type: none"> • Sense of place • Biodiversity • Conserving, enhancing and understanding historic character • Facilitating climate change adaptation 	<p>Various locations:</p> <p>Project 2: Ridgetop woodlands north of Chesham</p> <p>Project 3: Valley top woodland to the north of the Chess Valley east of Chesham</p> <p>Project 6: Woodland between Amersham on the Hill and Little Chalfont</p>	Extensive and important woodland resource in terms of landscape, biodiversity and historic environment, but hitherto low take up of positive land management schemes such as English Woodland Grant Scheme (EWGS) and component grants including for creation, management and bringing woodlands into active management.	NEP – liaison with relevant landowners and Forestry Enterprise to facilitate enhanced take up. Also liaison with Chilterns Conservation Board for area covered by AONB.	Forestry Enterprise, landowners. Chilterns Conservation Board.	English Woodland Grant Scheme (relevant grants include those for woodland creation, management, improvement and bringing back into active management) Chilterns Conservation Board’s Chalk Woodlands Project.	Potentially part met through EWGS. Woodland creation rate otherwise £20,000-25,000 per hectare.	During the next phase of EWGS agreements from 2013.	Through monitoring conditions associated with release of EWGS grant aid funding.
<p>4. Abstraction vulnerable chalk valleys: Wetland Conservation and Enhancement</p> <p>GI functions potentially delivered:</p> <ul style="list-style-type: none"> • Sense of place • Biodiversity • Conserving, enhancing and understanding historic character • Facilitating climate change adaptation and sustainable water/flood management 	Chess Valley – restoration and enhancement of urban and peri urban stretches (priority area, due to the Water Framework Directive – WFD Status of the Chess – over abstraction and vulnerability to low flows, although the principles would also benefit the Misbourne).	A need for action has been identified through the WFD which has revealed the vulnerability of the Chess to low flows due to over abstraction.	Environment Agency (EA)	EA, Chilterns Conservation Board for links to Chalk Streams Project	Chilterns Conservation Board’s Chalk Streams Project, plus links to Chalk Grasslands project.	£20,000 per hectare for restoration, stabilisation of bank profiles and re planting. For areas where break out of culverts are required see rates for River Wye project in the Wycombe proposals area.	-	Through conditions attached to release of WFD funding and AONB funding for delivery of improvements to chalk streams. Also through implementation of HLS agreements.

Project No/Name and GI functions delivered	Location/area	Project status/next steps	Project lead/owner	Delivery body/organisation	Associated programmes and partnerships	Total cost (cost band/range)	Timescale/phasing	Long term management and governance
<p>5. Improved links from the tube stations to the valleys</p> <p>GI functions potentially delivered:</p> <ul style="list-style-type: none"> • Access to recreation 	Amersham, Chesham and Chalfont and Latimer tube stations and associated paths and rights of way.	Need for liaison with Transport for London (TfL) regarding signage strategy and nature/acceptability of signage improvements.	Transport for London, County and District Councils.	Transport for London, County Council (wider way marking).	<p>Chess Valley Walk and partnership between the local authorities the route straddles (Chiltern District, Three Rivers District in Hertfordshire).</p> <p>TfL's 'Legible London' programme for tube station signage on the London Transport Network.</p>	Depends on final scope e.g. Interpretation board would cost £2,500, and finger post signage at £500 each (at 2013 prices).	2013-2016	TfL for station signage, County for other way marking as part of wider existing signage maintenance.
<p>6. Urban areas – 'Greening the town'</p> <p>GI functions potentially delivered:</p> <ul style="list-style-type: none"> • Health • Biodiversity • Sense of place 	Throughout the urban area	Consider formation of business improvement district to promote investment in urban greening	Chiltern District Council	Landowners through development schemes as they come forward	-	<p>Example costs for discrete elements:</p> <p>Sedum/turf roof: £1700/sq.m</p> <p>Street tree (assume 20-25 grade advanced nursery stock tree, with underground guying) £550 per tree.</p>	During the plan period	As part of conditions attached to planning applications

**Appendix 10 Extracts from Sustainability Appraisal of Chiltern and South Bucks Local
Plan, 2019**

Sustainability Appraisal of the Chiltern and South Bucks Local Plan

Regulation 19 SA Report Volume 1 of 2: Main Report

June 2019



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and negative impacts dependant on the location of each site, the scale of development proposed and the mitigation principles within each policy. Residual negative impacts would be likely in relation to carbon emissions, household waste generation, loss of soil resource, increase in pollution, restricted access to health facilities and alteration of the local landscape.

N73. Many of the Local Plan policies are likely to mitigate some of the negative impacts identified in relation to the site assessments and may also lead to overall positive effects.

Purpose and content of the 2019 Sustainability Appraisal report

N74. The 2019 Regulation 19 SA Report assesses further reasonable alternatives and summarises the process of SA undertaken over the preceding four years. The purpose of this report is 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.

N75. This SA Report contains:

- An outline of the contents and main objectives of the Local Plan and its relationship with other relevant plans, programmes and strategies;
- Relevant aspects of the current state of the environment and key sustainability issues for the Plan area;
- The SA Framework of objectives and indicators against which the Local Plan has been assessed;
- The appraisal of reasonable alternatives identified during the plan making process to date, including an explanation about how they were identified, and either rejected or selected;
- The likely effects of the Local Plan on sustainability;
- Recommendations for measures to reduce and as fully as possible offset any significant adverse effects which may arise as a result of the Local Plan; and
- A description of relevant monitoring requirements.

N76. **Appendix A** of this report sets out the SA Framework, which has been used as a basis for the assessment process.

- N77. **Appendix B** sets out the assessment of the reasonable alternative Green Belt sites.
- N78. **Appendix C** presents the assessment of 156 HELAA sites considered by the Councils.
- N79. **Appendix D** presents the assessment of the Local Plan policies. It is considered likely that the implementation of these policies would not result in negative impacts in relation to any of the SA Objectives.
- N80. **Appendix E** sets out the assessment of the strategic policies of the Local Plan, including the Building Site Allocations.
- N81. **Appendix F** sets out the assessment of the four strategic options that were considered by the Councils.
- N82. **Appendix G** presents an update to the PPP review first carried out in 2015.

Likely significant effects on the environment

- N83. Proposals in the Local Plan have been assessed for their sustainability impacts, the results of which are presented in **Appendices B, C, D, E and F** of this report. The assessment of the Local Plan, including reasonable alternatives, was undertaken using a combination of empirical evidence, and to a lesser extent, professional judgement. The findings are presented in matrix format and are accompanied by a commentary on identified effects. The matrix is not a conclusive tool. Its main function is to show visually the sustainability performance of the Local Plan. The assessment commentary should be relied on to interpret the matrix findings.
- N84. The paragraphs below provide a summary of the potential negative impacts of the Local Plan. These are the negative impacts that have been identified prior to the implementation of Local Plan mitigation.

Air Quality

- N85. Development proposed in the Local Plan is likely to reduce local air quality, resulting in implications for human health, as the combined increase in development across the Plan area will potentially increase traffic related emissions that could result in health implications for the vulnerable population. Increased traffic related emissions can also have negative

impacts upon the environment, increasing GHG emissions that could exacerbate climate change as well as increased nitrogen in the environment that could have adverse impacts upon sensitive habitats, such as eutrophication, acidification and toxicity.

Biodiversity

- N86. The Local Plan is likely to increase threats and pressures to designated biodiversity sites whether they be international, national or local. Proposed development would increase localised vehicle emissions, degrading nearby ecosystems. Several sites proposed for development coincide or are adjacent to priority habitats or ancient woodland and this can result in a cumulative decline of habitats in the Plan area. These habitats help to make up the Plan areas functioning ecological network, however development is likely to result in a direct loss of habitat links.

Climate Change

- N87. Proposed development within Local Plan is likely to increase the Plan area's carbon emissions by 21% or more, accelerating anthropogenic climate change which can lead to cumulative effects globally such as sea level rise and extreme weather events. Development in the Plan area is expected to locate site end users in areas at risk of pluvial and fluvial flood risk, this may exacerbate flood risk in the immediate area and contribute to increased flood risk downstream. Although policies within the Local Plan are expected to reduce fluvial flood risk, it is considered that development within Flood Zone 3 cannot be fully mitigated.

Cultural Heritage

- N88. The Local Plan is likely to have negative impacts upon cultural heritage within the Plan area. Development coincident with, or in proximity to a Scheduled Monument or Listed Building has the potential to affect the setting and historic significance of these cultural assets. Where sites are coincident with, or in proximity to Conservation Areas, Registered Parks and Gardens or Archaeological Notification Sites, there is potential for the development to directly impact the setting of the heritage assets that once lost, may cause irreversible damage.

Landscape

- N89. Development within the Plan area has the potential to adversely affect the local landscape. Development can result in impacts upon views, loss of

tranquillity, change in land use and encroachment or urban sprawl. These impacts may also affect the character of Chilterns AONB and the Regional and Country Parks within the Plan area. The introduction of built form that does not respect the local character can result in adverse impacts resulting in overall loss of sense of place throughout the Plan area.

Material Assets, Population and Health

- N90. The Local Plan is likely to result in some negative impacts upon population and human health. An increase of population density is likely to increase strain on local services and facilities such as GP surgeries, NHS hospitals, schools and open spaces. The increase in population density has contributed to a number of building allocations situated outside the sustainable distance from necessary health services and as a result healthy and active lifestyle for residents may be harder to achieve. Increased population and reduced access to facilities is likely to have a negative impact on local air quality, as residents are likely to travel further, increasing the volume of traffic. As a result, long-term health impacts upon local residents is likely.

Soil

- N91. A significant quantity of development is proposed by the Local Plan, a large proportion on greenfield sites where it is expected that new buildings will result in the direct loss of the soil resource. The loss to BMV land would reduce the quantity of the most productive and flexible agricultural land that can best deliver food and non-food crops for future generations. Soil provides essential services to the local area, that include nutrient cycling, abating flood risk, filtering water and carbon storage. Direct loss to soil through construction will reduce these essential ecosystem services.

Water

- N92. The Local Plan is likely to have negative impacts upon water. The majority of the Plan area is within a groundwater SPZ and so construction within these areas is likely to some extent increase the risk of groundwater contamination. Most sites are located away from a watercourse, however, surface and sub-surface water can travel over long distances and so inputs into the watercourse may cause significant harm to the quality of water. Development proposed within the Local Plan is likely to increase total water consumption in some locations which may increase the requirement

for higher water efficiency standards to be met in order to meet water demand.

N93. The SA has identified a range of positive and adverse potential impacts of the Local Plan on the objectives of the SA Framework, and consequently the topics in the SEA Directive.

N94. Some of the likely positive effects of the Local Plan are listed in **Table N.3** below.

Table N.3: Likely positive sustainability impacts of the Emerging Local Plan

Positive impacts	
	Employment
1	The Local Plan is anticipated to lead to a significant increase in employment opportunities and commercial floor space in the Plan area. This will help ensure all residents have access to employment opportunities which help to enable them to live a higher quality life.
	Housing
2	The development proposed in the Local Plan would make a significant contribution towards meeting the various housing needs in the Plan area, such as quantity, distribution and affordability.
	Physical and mental health
3	The Local Plan is anticipated to help ensure that residents in the Plan area have access to a range of health facilities, including GP surgeries, hospitals and natural habitats. This would be likely to help ensure that residents can pursue healthy lifestyles.
	Transport
4	The Local Plan is anticipated to help ensure that residents would have convenient access to frequent, affordable and sustainable modes of transport. Where this is currently not the case, it is likely that policies in the Local Plan would help ensure that the sustainable transport options are improved.
	Biodiversity
5	Although development proposed within the Local Plan would be expected to result in the loss of some biodiversity features, such as woodland and parkland, the policies ensure that internationally and nationally protected biodiversity sites (such as Burnham Beeches SAC) are protected and biodiversity net gain is promoted across the Plan area.
	Cultural Heritage
6	The policies set out in the Local Plan would be expected to help protect local historic assets and no adverse impacts would be expected.

N95. Negative effects of the plan were identified in respect of:

- Loss of a heritage asset;
- Alteration of a character to setting of a heritage asset;
- Impact on the Chilterns AONB;
- Impact on a Regional or Country Park;

- Impact on the local landscape character;
- Alteration of existing views;
- Increased risk of urban sprawl and coalescence;
- Threats and pressures to internationally or nationally designated biodiversity sites;
- Threats or pressures to locally designated biodiversity sites;
- Loss of a biodiversity asset;
- Increase in carbon emissions;
- Risk of surface water flooding;
- Risk of fluvial flooding;
- Loss of BMV land;
- Loss of soil;
- Water pollution;
- Increase in air and/ or noise pollution;
- Increased exposure to air and/ or noise pollution;
- Increase in household waste generation;
- Limited access to a bus stop;
- Limited access to rail services;
- Limited access to a local shop;
- Limited pedestrian access;
- Limited road access;
- Limited access to an NHS hospital with an A&E department;
- Limited access to a GP surgery;
- Limited access to sports facilities;
- Limited access to public greenspace;
- Limited access to the PRow and/ or cycle network;
- Loss of employment floorspace;
- Limited access to primary education facilities; and
- Limited access to secondary education facilities.

Mitigation

N96. The Local Plan sets out 90 policies which seek to positively respond to future development within the Plan area. These policies are expected to have positive impacts in relation to the site allocations within the Local Plan. Numerous policies would be likely to fully, or help to, mitigate the identified adverse impacts of proposed development.

N97. Whilst mitigation has been proposed for some effects, where this is not possible, or is not likely to, mitigate the nature of effect such that it is nullified, the following residual significant and/or cumulative adverse effects remain and are drawn to the attention of the plan makers in **Table N.4**.

Residual adverse effects

N98. The Councils have proposed many policies in the Local Plan which would be expected to help mitigate some of the adverse impacts of development on sustainability. However, there remain a number of residual impacts expected as a result of the Local Plan. These are presented in **Table N.4** below.

Table N.4: Likely residual adverse sustainability impacts of the Emerging Local Plan

Negative impacts	
	Local Air quality
1	The Local Plan is anticipated to lead to a reduction in local air quality with implications for human health. Development proposed in the Local Plan would place a large number of new residents in locations within 200m of busy or major roads and increase traffic volumes, contributing to decrease in air quality.
	Fluvial flood risk
2	The Local Plan is anticipated to increase fluvial flood risk. The majority of the Plan area is located in Flood Zone 1, however some sites in the Plan coincide with Flood Zones 2, 3a and 3b. Development in these areas would locate site end users in areas that are susceptible to fluvial flooding.
	Increased emissions of greenhouse gases
3	It is likely that the large quantity of development proposed within the Local Plan would increase the Plan area's carbon footprint by 21% or more, this results in increased carbon emissions. This increase would exacerbate the impacts of climate change.
	Impact on the Chilterns AONB
4	Adverse effects could potentially arise as a consequence of development proposals within the Local Plan which affect the Chilterns AONB and its setting. The development proposed in the Local Plan has the potential to adversely impact on views from more sensitive locations such views from the Chilterns AONB.
	Discord with the local landscape character
5	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.
	Alteration of views
6	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.
	Increase risk of coalescence and/or urban sprawl
7	The need to provide housing and employment in the Plan has led to the proposed allocation of development on greenfield sites at a number of locations within the Plan area.
	Loss of tranquillity
8	Reductions in tranquillity are likely as a result of development proposals at for example, Green Belt release locations. The introduction of both noise and night time lighting is likely to reduce tranquillity at these locations.
	Loss of soil resource including BMV land
9	

Negative impacts

	The Local Plan proposes a significant quantity of development, a large portion of which would be situated on previously undeveloped greenfield sites. At each previously undeveloped site, it is expected that where new buildings are constructed there will be a direct loss of soils with little scope for mitigation.
10	<p>Water Pollution</p> <p>The Local Plan would be likely to lead to a reduction in local water quality. Many sites being considered for development are currently previously undeveloped greenfield sites. It is considered to be likely that the construction and occupation/operation of residential or employment development at these locations would increase the risk of contamination and pollution of waterways to some extent. The majority of the Plan area is within a Groundwater Source Protection Zone (SPZ). These indicate the potential risks of different types of development for groundwater quality.</p>
11	<p>Increased stress of water resources</p> <p>There is no water available for licensing in either the Colne or the Thames catchment area. The large quantity of development proposed in the Local Plan would be likely to increase pressures on water resources.</p>
12	<p>Increased pressure on ecosystem services</p> <p>Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, filtering air, carbon storage and providing the basis for vegetation to flourish. Water provides a range of essential services to the local area, including drinking water, filtering water, providing the basis for vegetation to flourish, mental and physical wellbeing, and supporting biodiversity. The significant scale of development proposed within the Local Plan would be expected to increase pressure on essential ecosystem services.</p>

Monitoring

N99. The SA also discusses the importance of a monitoring programme to help ensure that adverse impacts of the Local Plan are identified, investigated and potentially avoided, mitigated or compensated. When opportunities for improving the sustainability performance of the Local Plan and the Districts arise over time, monitoring helps to ensure that these opportunities are recognised and taken advantage of.

N100. Monitoring has been prepared in relation to:

- Reduction in air quality with implications for human health;
- Increased emissions of greenhouse gases;
- Fluvial flood risk;
- Impact on the Chiltern AONB;
- Discord with the local landscape character;
- Alteration of views;
- Increase risk of coalescence and/ or urban sprawl;
- Loss of tranquility;
- Loss of soil resource including BMV land;
- Water pollution;
- Increased stress of water resources; and
- Increased pressure on ecosystem services.

4 Methodology

4.1 Introduction

4.1.1 The appraisal uses geographic information, the SA Framework and established standards (where available) to help make the assessment decisions transparent and robust.

4.1.2 Proposals in the Local Plan have been assessed against the SA Framework (see **Appendices B, C, D, E and F**). The SA Framework (see **Appendix A**) is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Annex 1(f)²² of the SEA Directive. Including the SEA topics in the SA Objectives helps ensure that all of the environmental criteria of the SEA Directive are included. Consequently, the twelve SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough. The SA Objectives and the SEA Topics to which they relate are set out in **Table 4.1**.

4.1.3 Each SA Objective is considered when appraising Local Plan site allocations, policies and reasonable alternative. It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

²² Annex 1(f) identifies: 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'.

Table 4.1: SA Objectives of the SA Framework (see Appendix A).

	SA Objective	Description	SEA Topic(s)
1	Cultural heritage	Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Cultural heritage including architectural and archaeological heritage
2	Landscape	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.	Biodiversity, fauna, flora, soil and landscape
3	Biodiversity and geodiversity	Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, fauna, flora and soil
4	Climate change mitigation	Minimise the districts' contribution to climate change.	Climate change
5	Climate change adaptation	Plan for the anticipated levels of climate change.	Climate change
6	Natural resources	Protect and conserve natural resources.	Biodiversity, flora, fauna & soil
7	Pollution	Reduce air, soil and water pollution.	Air, water & soil
8	Waste	Reduce waste generation and disposal and achieve the sustainable management of waste.	Material assets, population
9	Transport and accessibility	Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Population, human health, air & climate change
10	Housing	Provide affordable, environmentally sound and good quality housing for all.	Population, human health and material assets
11	Health	Safeguard and improve community health, safety and well-being.	Population & human health
12	Economy	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population & material assets

4.2 Integrated approach to SA and SEA

4.2.1 The SEA Directive applies to a wide range of public plans and programmes, including land use plans (see Article 3(2)) of the SEA Directive²³). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633²⁴).

4.2.2 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making. The SEA Directive and SEA Regulations necessitate an environmental report in which the likely significant effects on the environment are identified for Local Plan proposals and reasonable alternatives.

4.2.3 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19 (5) of the Planning and Compulsory Purchase Act 2004 and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012.

4.3 Best practice guidance

4.3.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process. Government policy recommends that both SA and SEA are undertaken under a single SA process, which incorporates the requirements of the SEA Directive. A range of documents have been utilised in preparing this report:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment²⁵.

²³ Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042>

²⁴ Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

²⁵ Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date Accessed: 22/01/19]

- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive²⁶.
- Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework (NPPF)²⁷.
- Ministry of Housing, Communities and Local Government (2018) Planning Practice Guidance (PPG)²⁸.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans²⁹.

²⁶ Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 14/05/19]

²⁷ Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 22/01/19]

²⁸ Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 22/01/19]

²⁹ Available at: <http://www.rtpi.org.uk/media/2668152/sea-sapracticeadvicefull2018c.pdf> [Date Accessed: 22/01/19]

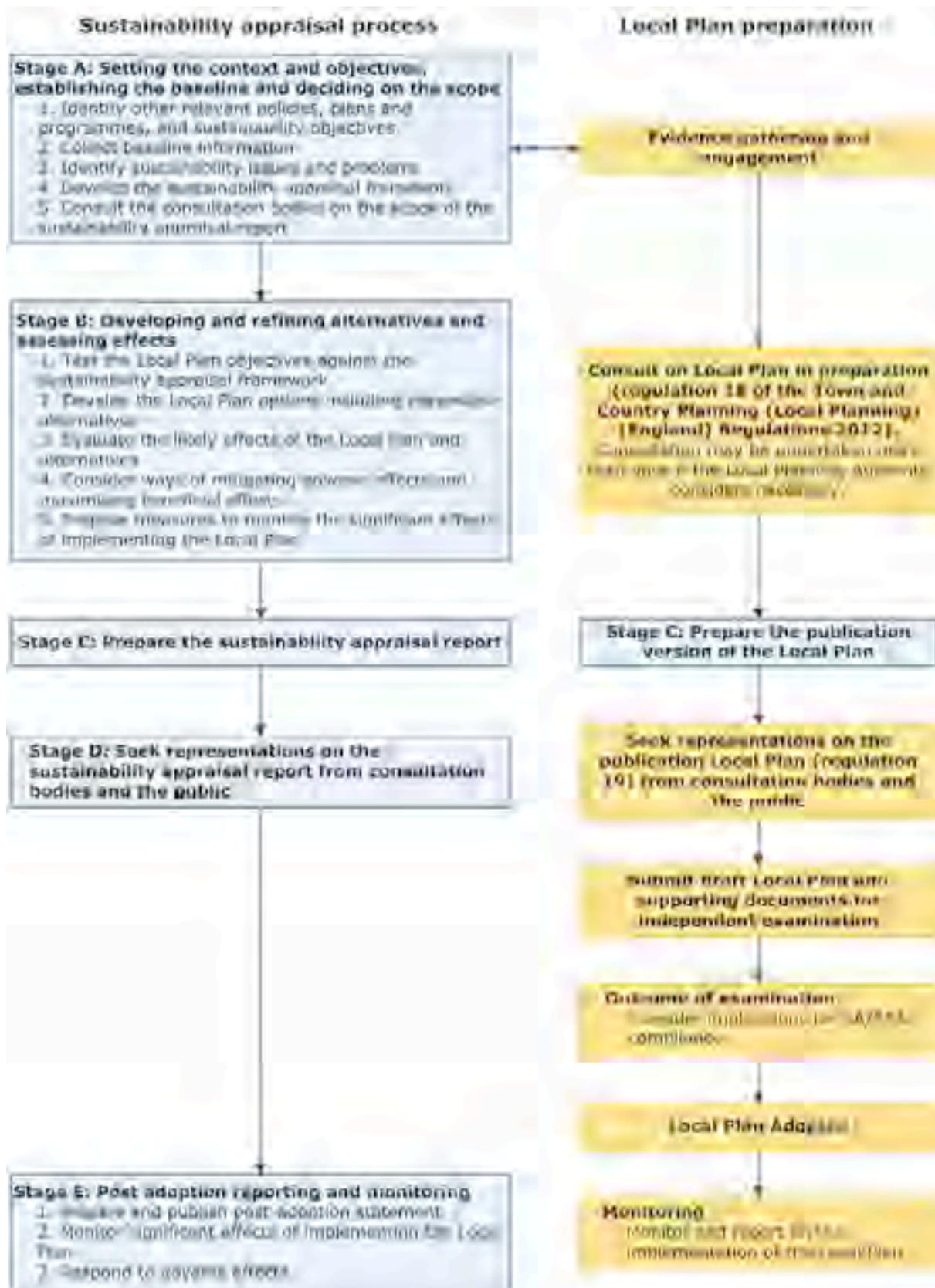


Figure 4.1: Stages of the SA process in relation to Local Plan preparation³⁰.

³⁰ MHCLG (2015) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date Accessed: 12/03/19]

4.4 Appraisal process

4.4.1 The appraisal process has used the SA Framework, the review of plans, programmes and policies and the baseline (including various mapped data sources), as presented in the SA Scoping Report³¹, to assess each option. Assessments have been undertaken using this empirical evidence and, to a lesser extent, expert judgement.

4.4.2 When evaluating significance of effect, the SEA draws on criteria in Annex II of the SEA Directive (see **Box 4.1**) and identifies a significance value using the guide in **Table 4.2**.

Box 4.1: Annex II of the SEA Directive³²

Criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste- management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

³¹ Lepus Consulting (November 2015) Sustainability Appraisal of the Chiltern and South Bucks Local Plan: Scoping Document

³² EU Council (2001) Directive 2001/42/EC. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 22/01/19]

4.5 Impact assessment and determination of significance

4.5.1 Significance of effect is a combination of impact sensitivity and magnitude. Impact sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing scenario, the greater will be the significance of effect.

4.6 Impact sensitivity

4.6.1 Impact sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

4.6.2 A guide to the range of scales used in determining impact sensitivity is presented in **Table 4.2**. For most receptors, sensitivity increases with geographic scale.

Table 4.2: Impact sensitivity

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

4.7 Impact magnitude

4.7.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 4.3**).

Table 4.3: Impact magnitude

Impact magnitude	Typical criteria
High	Likely total loss of or major alteration to the receptor in question; <ul style="list-style-type: none"> • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

4.8 Significant effects

4.8.1 A single value from **Table 4.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process. The assessment of impacts and subsequent evaluation of significant effects is in accordance with the footnote of Annex 1(f) of the SEA Directive, where feasible, which states:

“These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects”.

Table 4.4: Guide to scoring significant impacts

Significance	Definition (not necessarily exhaustive)
Major negative ---	<p>The size, nature and location of a proposed scheme would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Moderate negative --	<p>The size, nature and location of a proposed scheme would be likely to:</p> <ul style="list-style-type: none"> • Be out of scale with the location; and/or • Leave an adverse impact on a receptor of recognised quality.
Minor negative -	<p>The size, nature and location of a proposed scheme would be likely to:</p> <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	<p>Either no impacts are anticipated, or any impacts are anticipated to be negligible.</p>
Uncertain +/-	<p>Impacts are anticipated, but it is entirely uncertain whether they would be positive or adverse.</p>
Minor positive +	<p>The size, nature and location of a proposed scheme would be likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Moderate positive ++	<p>The size, nature and location of a proposed scheme would be likely to:</p> <ul style="list-style-type: none"> • Fit well with the location; and/or • Improve one or more key elements/features/ characteristics of a receptor with recognised quality, such as a specific district or county designation.
Major positive +++	<p>The size, nature and location of a proposed scheme would be likely to:</p> <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale. • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific regional or national designation.

- 4.8.2 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of a site in terms of the relevant SA Objective, the precautionary principle³³ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the site.
- 4.8.3 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 4.8.4 Significance of effect has been categorised as minor, moderate or major. **Table 4.4** sets out the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 4.8.5 Each reasonable alternative site that has been identified in this report has been assessed for its likely significant effect against each SA Objective in the Framework, as per **Table 4.4**. Likely impacts are not intended to be summed.
- 4.8.6 It is important to note that the assessment scores used in **Table 4.4** are high level indicators. The assessment narrative should always be read alongside the significance score. Topic specific methods and assumptions in **Table 4.5** offer further insight into how each significant impact score was arrived at.

³³ The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered.”

4.9 Limitations of predicting effects

4.9.1 SA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates professional judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

4.9.2 The assessments in this report are based on the best available information, including that provided to us by the Councils and information that is publicly available. The assessment of reasonable alternatives is somewhat limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. Every attempt has however been made to predict effects as accurately as possible.

4.9.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all reasonable alternatives must be assessed in the same way.

4.9.4 All reasonable alternatives have been assessed in relation to potential effects against each SA Objective. However, for the sake of brevity and to maintain the readability of the report, where the assessment finds there are likely to be negligible effects as a consequence of the allocation of a site this is not described in the accompanying text.

4.10 SEA Topic methodologies and assumptions

4.10.1 A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives (see **Table 4.5**). These should be borne in mind when considering the assessment findings.

Table 4.5: Topic specific methodologies and assumptions

SA Objective	Assessment Methodologies and Assumptions
<p>1. Cultural Heritage: Protect, enhance and manage options, features and areas of archaeological, historical and cultural heritage importance.</p>	<p>Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets. The level of the impact has been assigned based on the nature and significance of, and proximity to, the heritage asset in question.</p> <p>Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), Conservation Areas and Archaeological Notification Sites (ANS).</p> <p>It is assumed that where a designated heritage asset coincides with a site proposal, the designated heritage asset will not be lost as a result of development (unless otherwise specified by the Councils). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.</p> <p>Setting:</p> <p>Development which would be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets that are important components of the local area. Views of, or from, the heritage asset are considered as part of the assessment of potential impacts on the setting of the asset.</p> <p>Designated Features:</p> <p>Where a Grade I Listed Building, a Scheduled Monument or a Registered Park and Garden coincides with a site proposal, it is assumed that the settings of these features will be permanently altered, and a major negative impact would be expected.</p> <p>Where a Grade II* or Grade II Listed Building, a Conservation Area or Archaeological Notification Site coincides with a site proposal, or where a site lies adjacent to a Grade I or Grade II* Listed Building, a Scheduled Ancient Monument or a Registered Park and Garden, it is assumed that the proposal would also permanently alter the setting of the asset and a moderate negative impact on the historic environment would be expected.</p> <p>Where the site lies adjacent to a Grade II Listed Building, a Conservation Area, or an Archaeological Notification Site, or where a site proposal is located in</p>

SA Objective	Assessment Methodologies and Assumptions
	<p>close proximity to a Grade I, Grade II* or Grade II Listed Building, a Scheduled Monument, a Registered Park or Garden or a Conservation Area, it is assumed there will be an adverse impact on the setting of the asset, to some extent, and a minor negative impact would be expected.</p> <p>It is anticipated that the Local Planning Authority will require a Heritage Statement to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.</p> <p>Where development proposals are not located in close proximity to any heritage asset, or the nature of development is determined not to affect the setting or character of the nearby heritage asset, a negligible impact is expected for this objective.</p> <p>Heritage features identified on Historic England’s Heritage at Risk Register may be identified as being at risk for a number of reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment³⁴.</p>
<p>2. Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.</p>	<p>Impacts on landscape will be largely determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed proposals for each site are uncertain at this stage of the assessment. Furthermore, this assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. However, there is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.</p> <p>The Chilterns AONB:</p> <p>The Chilterns Area of Outstanding Natural Beauty (AONB) is a nationally designated landscape. This AONB coincides with the majority of the Chiltern District and a proportion of South Bucks to the north. The Chilterns AONB Management Plan 2014-2019³⁵ sets out 17 policies that aims to protect the</p>

³⁴ Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register> [Date Accessed: 12/04/19]

³⁵ The Chilterns Conservation Board (2014) Chilterns Area of Outstanding Natural Beauty Management Plan 2014-2019: A Framework for Action. Available at: https://www.chilternsaonb.org/uploads/files/ConservationBoard/ManagementPlan/Management%20Plan%202014-19/chilterns_management_plan_2014-19_final.pdf [Date Accessed: 15/04/19]

SA Objective	Assessment Methodologies and Assumptions
	<p>landscape character of the AONB and ensure future development is appropriate to its setting.</p> <p>Sites which coincide with the Chilterns AONB are assumed to directly impact on the natural beauty or special qualities of this designated landscape and a major negative impact on this landscape receptor is expected. 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. Sites which lie in close proximity to, may be visible from, or which may affect the appreciation of the special qualities of the Chilterns AONB are assumed to have an impact on the setting of the AONB and a moderate negative impact on this landscape receptor is expected.</p> <p>Discordant with LCA:</p> <p>Baseline data on Landscape Character Areas (LCAs) within the Plan area are derived from the 2011 'Chiltern District Landscape Character Assessment'³⁶ and 'South Bucks District Landscape Character Assessment'³⁷. Key characteristics of each LCA have informed the appraisal of each site proposal against the landscape objective. Given that the detailed nature of the landscape in relation to each site is unknown, the assessment of impact is based on the overall landscape character guidelines and key characteristics. Proposals which are considered to be potentially discordant with the guidelines and characteristics provided in the published landscape character assessment are assessed as having a minor negative impact on the landscape objective.</p> <p>Country Park:</p> <p>Development proposals which coincide with a Country Park have the potential to result in irreversible adverse impacts and therefore are assumed to have a moderate negative impact on the landscape objective.</p> <p>Proposals that are located adjacent or in close proximity to a Country Park, and therefore could potentially adversely affect views from Country Parks, are assumed to have a minor negative impact on the landscape objective.</p> <p>Views:</p> <p>Site proposals which may alter views of a predominantly rural or countryside landscape for users of the Public Rights of Way (PRoW) network and local</p>

³⁶ Land Use Consultants (2011) Chiltern Landscape Character Assessment. Available at: <https://www.buckscc.gov.uk/services/environment/landscape/landscape-character-assessments/chiltern-district/> [Date Accessed: 12/04/19]

³⁷ Land Use Consultants (2011) South Bucks Landscape Character Assessment. Available at: <https://www.buckscc.gov.uk/services/environment/landscape/landscape-character-assessments/south-bucks/> [Date Accessed: 12/04/19]

SA Objective	Assessment Methodologies and Assumptions
	<p>residents are assumed to have minor negative impacts on the landscape objective. Site proposals which may alter views of a predominantly rural or countryside landscape for users of the National Trail network are assumed to have moderateneegative impacts on the landscape objective.</p> <p>In order to consider potential visual effects of development it has been assumed that the proposals would, broadly, reflect the character of nearby development of the same type.</p> <p>Potential views from residential properties are identified through the use of aerial photography. In locations characterised by retail, or similar commercial uses, a precautionary approach is taken, and it is assumed that there may be residential properties on the upper floors above the ground floor commercial spaces.</p> <p>It is anticipated that the Councils will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) to accompany any future proposals, where relevant. The LVIAs should seek to provide greater detail in relation to the landscape character of the site and its surroundings, the views available towards the site, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.</p> <p>Urban Sprawl:</p> <p>Site proposals which are considered to increase the risk of future development spreading further into the wider landscape are assessed as having a minor negative impact on the landscape objective.</p> <p>Site proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements are assessed as having a potential moderate negative impact on the landscape objective.</p>
<p>3. Biodiversity: Protect, enhance and manage biodiversity and geodiversity.</p>	<p>The biodiversity objective considers impacts and opportunities for development at a landscape-scale. It focuses on an assessment of development on a network of designated sites, wildlife corridors and individual habitats within the Plan area. These ecological receptors include the following:</p> <p>Designated Sites:</p> <ul style="list-style-type: none"> • Natura 2000 sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites). • Sites of Special Scientific Interest (SSSI). • National Nature Reserves (NNR). • Local Nature Reserves (LNR).

10 Landscape

10.1 Baseline

10.1.1 Landscape is described as comprising natural, cultural, social, aesthetic and perceptual elements. This includes flora, fauna, soils, land use, settlement, sight, smells and sound⁹⁵. The Plan area is predominantly rural in character, with some larger settlements and urbanising influences. Much of the Chilterns District lies within the Chilterns Area of Outstanding Natural Beauty (AONB), a national landscape designation. A small part of this designation lies within the South Bucks District.

10.1.2 The Chilterns AONB is a nationally important landscape. The Chilterns AONB extends to 324 square miles of countryside, stretching from the River Thames in southern Oxfordshire up through Buckinghamshire and Bedfordshire to Hitchin in Hertfordshire. It is one of 38 AONBs in England and Wales, which belong to the same family as National Parks. Its designation as an AONB in 1965 recognised that the Chiltern Hills contain some of the finest landscapes in the country which are worthy of protection at the highest level. The Chilterns AONB is a living, working area of countryside whose character has been shaped by people for centuries. Farmland covers nearly two-thirds of the AONB and over one-fifth of the area is wooded. The chalk rock underlying the Chilterns gives rise to hillsides of velvety chalk downland. Water stored in the rock emerges from springs to feed clear, sparkling chalk streams like the Chess and Misbourne.

10.1.3 Landscape Character Assessments were prepared for the Chiltern District⁹⁶ and South Bucks District in 2011⁹⁷. These assessments describe the character of the landscape across the two Districts and these are briefly summarised below. The assessment identified 30 Landscape Character Areas across the two Districts. The assessment also identifies

⁹⁵ Natural England (2014) An Approach to Landscape Character Assessment. Available at: <https://www.gov.uk/government/publications/landscape-character-assessments-identify-and-describe-landscape-types> [Date Accessed: 13/03/19]

⁹⁶ Land Use Consultants (2011) Chiltern District Landscape Character Assessment. Available at: <https://www.buckscc.gov.uk/services/environment/landscape/landscape-character-assessments/chiltern-district/> [Date Accessed: 13/03/19]

⁹⁷ Land Use Consultants (2011) South Bucks District Landscape Character Assessment. Available at: <https://www.buckscc.gov.uk/services/environment/landscape/landscape-character-assessments/south-bucks/> [Date Accessed: 13/03/19]

existing development limits to the settlements in the study area. The settlements were not included as part of the Landscape Character Assessments which focuses on the more rural landscapes in the study area.

10.1.4 The Chiltern District lies on chalk strata and 'dip slope', which gradually falls south eastwards towards Greater London. It is largely overlain by clay with flints. Steep-sided valleys include the Chess Valley and the Misbourne Valley. The rolling landform supports arable cultivation and pasture. There are significant areas of ancient woodland and beech is a dominant species. Amersham and Chesham are the principal towns within the District, with other settlements including Chalfont St Peter, Chalfont St Giles and Great Missenden. The historic villages of Latimer and Chenies are located in the Chess Valley. Despite its proximity to London, the District retains a relatively rural and tranquil character with remote areas of rolling farmland and river valleys. A significant proportion of the Chiltern District lies within the Chilterns AONB recognising the highly scenic quality of the landscape. Historic country houses, within designed parkland landscapes have a strong influence on the landscape.

10.1.5 South Bucks is predominately underlain by London Clay. The landscape is gently undulating with the Alder Bourne Valley and the lower Misbourne Valley demonstrating the most distinctive topographical change. The Thames Valley floodplain comprises a stretch along the southern boundary. The shallow Colne Valley forms the eastern boundary of the District with water bodies associated with former gravel extraction. There is a strong wooded character across the centre of the District with significant blocks of ancient woodland, for example, Burnham Beeches. Several important historic parks and gardens are located within this wooded zone, including Cliveden. Small areas of heathland are also an important characteristic, including Stoke Common. Much of the District is farmland with a mix of arable and pasture. In the east, towards London, there is a stronger urban character with a denser network of roads, railways and settlements. Gerrards Cross, Beaconsfield, Burnham, Farnham Common, Denham Green, Iver, Iver Heath and Stoke Poges are the most significant settlements within South Bucks.

10.1.6 There are four Country Parks in the Plan area, comprising Black Park, Langley Park, Denham Park and Thorney Park, all of which are located in the South Bucks District. The Thames Path National Trail is located towards the south western edge of the Plan area, while a short section of

the Ridgeway National Trail passes through the northern edge of the Plan area.

10.2 Impacts on landscape

10.2.1 **Box 10.1** presents a plan-wide summary of the adverse impacts that have been identified through the SA process. These adverse impacts have been identified prior to mitigation considerations. **Box 10.2** lists policies within the Local Plan that would be likely to mitigate, partially or fully, some of the identified adverse impacts. Under circumstances where the Local Plan policy partially mitigates or if there is no mitigating Local Plan policy, a residual effect is recorded. **Box 10.3** explores the nature of the identified residual effects and makes recommendations for enhancements to the Local Plan.

Box 10.1: Summary of identified impacts on landscape.

Chilterns AONB

1 Loss of fields and other rural features and their replacement with built form leads to a change in character. Changes in landscape character have the potential to adversely affect the Chilterns AONB at certain locations, for example, Chesham and Holmer Green. Adverse effects may also arise as a consequence of development proposals within the Plan which affect the setting of the Chilterns AONB. The development proposed in the Plan has the potential to adversely impact on views from more sensitive locations as from the Chilterns AONB.

Regional and Country Parks

2 Regional and Country Parks are primarily used for recreation. The development proposed in the Plan has the potential to impact the landscape character and views from these valued local recreational assets e.g. Colne Valley Regional Park.

Change in character through change in land use

3 Several sites assessed in this report were anticipated to have adverse effects on the distinctive characteristics of the various Landscape Character Areas that lie across the Plan area. For further details see **Appendix C and E**.

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.

In some cases, it is anticipated that the development proposed in the Plan will adversely impact, or potentially result in the loss of, landscape features such as trees, hedgerows, woodlands and ponds, amongst others.

Impacts on views

The development proposed in the Plan has the potential to adversely impact on views from more sensitive locations such as views from the Chilterns AONB and views from National Trails.

- 4 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. Development proposed in the Plan lies in close proximity to existing residential properties and has the potential to adversely impact views from these properties.

Encroachment or Urban Sprawl

5 The development at some of the sites proposed in the Plan may lead to the physical, or perceived, loss of separation between settlements. The need to provide housing and employment in the Plan has led to the proposed allocation of development on greenfield sites at a number of locations within the Plan area.

Loss of tranquillity through land use change

Tranquillity is considered to be a significant asset of landscape. Judgements about landscape are ultimately personal. The Chilterns Tranquillity Study⁹⁸ used participatory appraisal techniques to engage the views, knowledge and experience of local people. Since tranquillity is personal, views varied, however common themes included an association with nature and access to the countryside.

- 6 Increased light pollution and consequently impacts on Dark Skies⁹⁹ may arise as a consequence of the development proposed in the Plan. Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban.

Reductions in tranquillity are likely as a result of development proposals at for example, Green Belt release locations. The introduction of both noise and night time lighting is likely to reduce tranquillity at these locations.

10.3 Local Plan mitigation

- 10.3.1 The Local Plan spatial strategy focuses development on previously developed land, where possible. In order for the Plan to deliver growth and meet identified housing and employment needs some development

⁹⁸ The Countryside Agency (2005) Chilterns Tranquillity Study: Summary report on the participatory appraisal consultations in the Chilterns Area of Outstanding Natural Beauty. Available at: <https://webarchive.nationalarchives.gov.uk/20101219013025/http://countryside-quality-counts.org.uk/publications/Chilterns-Summary-Report.pdf> [Date Accessed: 09/05/19]

⁹⁹ Campaign to Protect Rural England (no date) NightBlight: Reclaiming our dark skies. Available at: https://www.nightblight.cpre.org.uk/?gclid=Cj0KCQjwn8_mBRCLARIsAKxi0GKSp30whEredoviY2C0BQZyTOScw_AHFipqf8-mqcXSnrCREne3FYgaAhdVEALw_wcB [Date Accessed: 09/05/19]

will need to be accommodated within areas formerly included in the Metropolitan Green Belt. A Green Belt review¹⁰⁰ has been undertaken to assess the most suitable sites for release.

10.3.2 In addition, the call for sites brought forward numerous smaller sites, all of which are located in areas of previously developed land.

10.3.3 Policies proposed in the Local Plan would be likely to help protect and potentially enhance the character and distinctiveness of landscapes and townscapes throughout the Plan area. Policies which would help to mitigate the potential impacts are identified in **Box 10.2**. Any residual impacts as a consequence of the Local Plan policies as a whole are identified and recommendations to address these are provided in **Box 10.3**

Box 10.2: Local Plan Policy Mitigation

Adverse Impact	Local Plan Policy mitigation	Residual impact
Impact on the Chilterns AONB.	<p>Policy DM NP1 – Chilterns Area of Outstanding Natural Beauty</p> <p>Planning permission will be provided to a proposed development within the AONB provided that the plan conserves and enhances the special qualities and distinctive features which contribute to the natural beauty of the Chilterns AONB. The proposed plan must also have regard for the management plan of the AONB and the design of the development must reinforce the sense of place and local area.</p> <p>Should a proposed plan cause adverse impacts, planning permission is likely to be refused, unless the plan can demonstrate exceptional circumstances and the development is in the interest of the public.</p> <p>Policies SP BP2 to SP BP14</p> <p>The requirements of the site-specific policies for the Building Site Allocations seek to mitigate significant adverse impacts on the natural beauty of the Chilterns AONB and its setting.</p>	Minor Negative
Impact on a Regional or Country Park.	<p>Policy DM NP2 Colne Valley Regional Park</p> <p>Policy DM NP2 ensures that planning permission will only be granted if a proposed development makes positive contributions towards the Colne Valley Regional Park. This includes maintaining and enhancing the landscape, conserving and enhancing</p>	Negligible

¹⁰⁰ Chiltern District and South bucks District (2016) Green Belt Assessment Part Two – Draft Report. Available at: http://www.chiltern.gov.uk/media/8744/Draft-Green-Belt-Assessment-Part-Two-Main-Report-October-2016-/pdf/Green_Belt_Part_Two_Main_Report_Final_For_Consultation.pdf?m=636132675249830000 [Date Accessed: 23/05/19]

Adverse Impact	Local Plan Policy mitigation	Residual impact
	<p>biodiversity, providing recreational opportunity for all and seeking to achieve a vibrant and sustainable rural economy.</p> <p>Policies SP BP2 to SP BP14</p> <p>The requirements of the site-specific policies for the Building Site Allocations seek to mitigate significant adverse impacts on Country Parks. Development of site SP BP13 will result in the loss of an area of County Park and a residual adverse impact is expected.</p>	
<p>Discord with the local landscape character.</p>	<p>Policy DM DPI – Process and Principles</p> <p>A proposed plan must demonstrate that the site and its context has been considered within the design. The opportunities and constraints of the design should be identified, and the principles of the design should be reflected positively in terms of the local landscape character.</p> <p>Policy DM DPI3 – Quality and Street Relationships of Buildings</p> <p>Policy DM DPI3 states that proposed developments that are well integrated into their surroundings and provide a positive physical and visual relationship to the local landscape character, will be granted planning permission. Where inactive developments are unavoidable, they should be located away from the public.</p> <p>Policies SP BP2 to SP BP14</p> <p>Site-specific policies for the BSAs require consideration of landscape and visual circumstances of the site and set out the principles to be applied in the accompanying landscape scheme.</p>	<p>Minor Negative</p>
<p>Alteration of views.</p>	<p>Policy DM DPI3 – Quality and Street Relationships of Buildings</p> <p>The alteration of views by a proposed development will be granted provided that new buildings are well-integrated in the public space and provide a positive physical and visual relationship to the local area, where applicable, adopting a traditional style.</p> <p>Policy DM DPI6 - Privacy, Daylight and Sunlight</p> <p>Proposals for new developments should consider the degree of overlooking from and to new and existing homes, orientation of windows in respect of privacy, daylight and sunlight. Planning permission will not be granted to a proposed development that has an overbearing effect on the local area.</p> <p>Policies SP BP2 to SP BP14</p>	<p>Minor Negative</p>

Adverse Impact	Local Plan Policy mitigation	Residual impact
	Site-specific policies for the BSAs require consideration of landscape and visual circumstances of the site and set out the principles to be applied in the accompanying landscape scheme.	
Increase risk of coalescence and/or urban sprawl.	<p>Policy DM DPI – Process and Principles</p> <p>Planning applications for major developments that could increase risk of coalescence and/or urban sprawl should follow design stages 1-4. This will ensure that the context of the site to be developed is understood and the vision for the development is set out in a clear and concise manner, testing alternative options.</p> <p>Policies SP BP2 to SP BP14</p> <p>Site-specific policies for the BSAs require consideration of landscape and visual circumstances of the site and set out the principles to be applied in the accompanying landscape scheme.</p> <p>Development of the BSAs is likely to be considered to be urban sprawl. The key policy protection to prevent urban sprawl relates to protection provided by the Green Belt. The Green Belt boundaries have been redrawn following the Green Belt Review. The redefined Green Belt is considered to robustly prevent further urban sprawl, beyond the Plan period.</p>	Moderate Negative
Loss of tranquillity	<p>Policy DM DPI – Process and Principles</p> <p>This policy sets out Design Stages for ‘major developments’ and the accompanying Appendix DPI provides further details of the process and requires consideration of the effects of lighting on surrounding areas.</p>	Minor Negative

10.4 Residual impacts and recommendations

10.4.1 The Emerging Local Plan sets out a number of policies which will serve to mitigate many of the identified adverse impacts on the identified landscape receptors. **Box 10.3** sets out the identified residual impacts and any recommendations that are considered to further mitigate these effects.

Box 10.3: Residual impacts and recommendations for landscape

Residual impact	Further details of the residual impact
Impact on the Chilterns AONB.	<p>In accordance with the NPPF, Policy DM NP1 – Chilterns Area of Outstanding Natural Beauty states that development proposals that lead to adverse impacts on the Chilterns AONB would only be granted planning permission in exceptional circumstances in cases of demonstrable over-riding public interest.</p>
Discord with the local landscape character.	<p>The proposed policies relate to ‘major development’ (in the case of design Policy DM BPI), the site-specific policies for the BSAs or the nationally designated AONB. There is not a policy which seeks to protect the character of the wider landscape which lies outside of the Chilterns AONB (and setting).</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. A Plan-wide policy which requires all proposed development to assess the impacts of development proposals on landscape character and particularly the findings of the Chiltern and South Bucks Landscape Character Assessments (2011). 2. A Plan-wide policy which provides protection for landscape features, such as trees and hedgerows, in relation to planning applications for development. This could be achieved through the requirement for a British Standard Tree Survey.
Alteration of views.	<p>The proposed policies relate to ‘major development’ (in the case of policy DM BPI), the site-specific proposals of the BSAs or the nationally designated AONB. Sensitive views and the visual amenity of the wider landscape in the Plan area do not benefit from Plan-wide policy protection.</p> <p>Recommendations: A Plan-wide policy which requires all proposed development to consider the effects of the proposals on visual amenity, and particularly to identify sensitive visual receptors and mitigate adverse impacts on these views, for example, through the requirement for Landscape and Visual Impact Assessments to accompany planning applications where there may be potentially adverse visual impacts.</p>
Increase risk of coalescence and/or urban sprawl.	<p>There is anticipated to be an adverse residual impact in relation to coalescence and urban sprawl for a number of the sites in the Plan. While the Design Checklist in Policy DM DPI serves to mitigate some of the adverse impacts in relation to these aspects, it is likely a moderate residual impact will remain.</p>
Loss of tranquillity	<p>The loss of tranquillity as a consequence of noise generation due to proposed developments should be given greater policy protection. The consideration of tranquillity as a characteristic of the receiving landscape is not fully considered.</p> <p>Recommendations: A Plan-wide policy which requires all proposed development to assess the effects of the proposals on landscape character, particularly tranquillity, for example by reference to the findings of the Chiltern and South Bucks Landscape Character Assessments (2011).</p>

Sustainability Appraisal of the Chiltern and South Bucks Local Plan

Regulation 19 SA Report Volume 2 of 2: Appendices

June 2019



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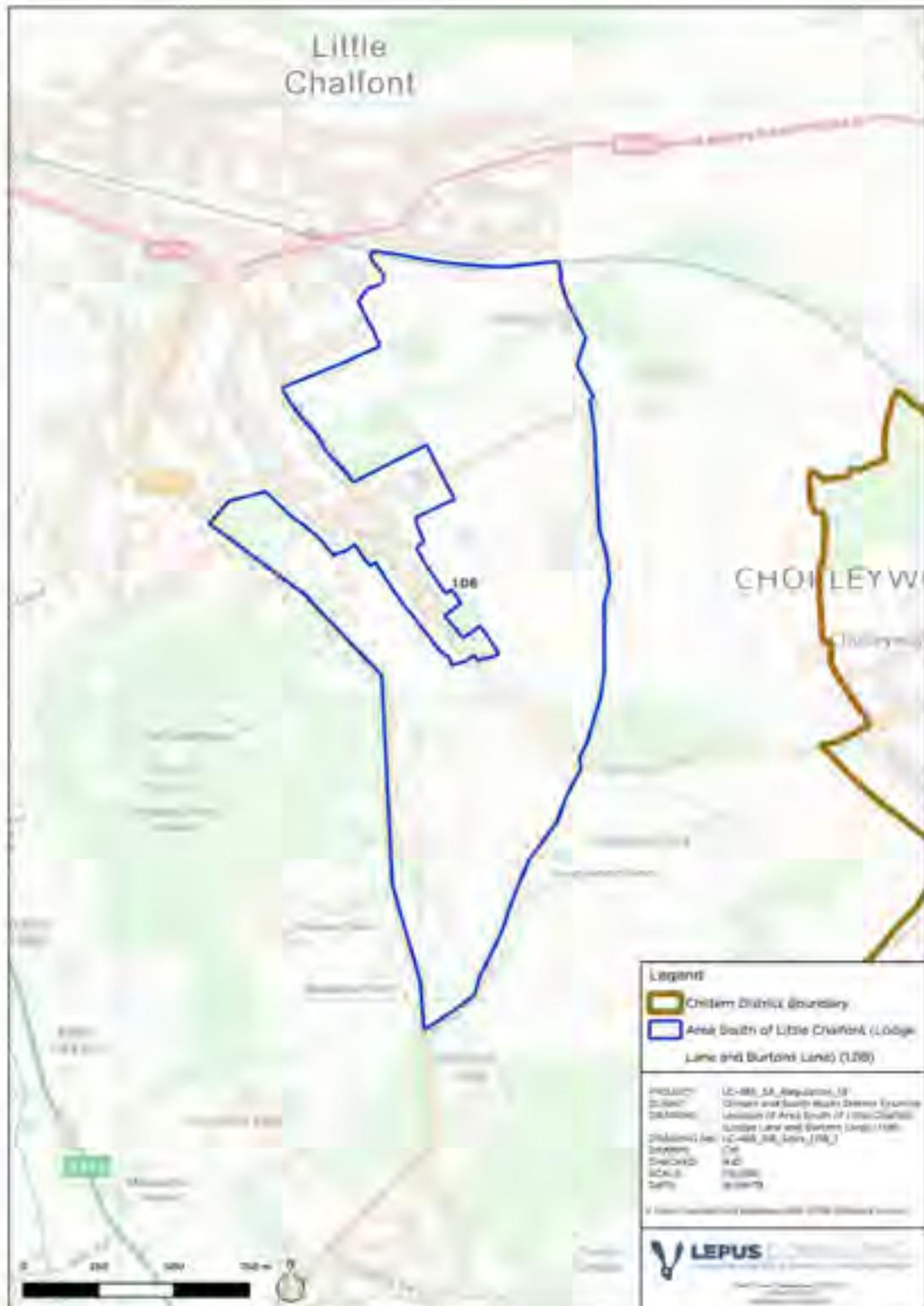
Appendix A: SA Framework

#	SA Objective	Decision making criteria: Will the option/proposal...		Indicators include (but are not limited to)
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Q1a	Will it preserve features of architectural or historic interest and, where necessary, encourage their conservation and renewal?	<ul style="list-style-type: none"> • Number and type of features and areas of historic designations in the district; • Statutory and non-statutory sites in the Historic Environment Record (HER); and • Number of historic assets on the Heritage at Risk register.
		Q1b	Will it preserve or enhance archaeological sites/remains?	
		Q1c	Will it preserve or enhance the setting of cultural heritage assets?	
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.	Q2a	Will it safeguard and enhance the character of the landscape and local distinctiveness and identity?	<ul style="list-style-type: none"> • Chiltern and South Bucks Landscape Character Assessment profiles; • Tranquility rating of area; • Re-use of derelict buildings or re-use of buildings in a prominent location; and • Impact of development on areas within the Green Belt, AONB and/or Colne Valley Regional Park.
		Q2b	Will it protect and enhance visual amenity, including light and noise pollution?	
		Q2c	Will it reuse degraded landscape/townscape?	
		Q2d	Will it compromise the purpose of the Green Belt e.g. will it lead to coalescence of settlements and/or urban sprawl?	
		Q2e	Will it protect and enhance the characteristics and setting of the Chilterns AONB and/or Colne Valley Regional Park?	

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B.10 Area South of Little Chalfont (Lodge Lane and Burtons Lane) (1.08)



Site Reference	1	2	3	4	5	6	7	8	9	10	11	12
	Cultural heritage	Landscape	Biodiversity & Geodiversity	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport and Accessibility	Housing	Health	Economy
1.08	--	---	---	---	---	---	---	---	-	+++	-	-

B.10.1 SA Objective 1 - Cultural Heritage

B.10.1.1 Grade II* Listed Buildings: Site 1.08 is located approximately 550m to the north east of the Grade II* Listed Building 'The Vache' and approximately 850m to the north west of the Grade II* Listed Building 'Shrub's Wood including Attached Walls and Planting Boxes Surrounding Garage Court and Patio'. Development proposals at this site could potentially impact the setting of these Listed Buildings and therefore, a minor negative impact on the local historic environment would be expected.

B.10.1.2 Grade II Listed Buildings: Site 1.08 is coincident with the Grade II Listed Building 'Nightingales'. Development proposals at this site could potentially have a direct adverse impact on this Listed Building and therefore, have a moderate negative impact on the historic environment. The site is also adjacent to the Grade II Listed 'Roughwood Farmhouse', 'Barn to West of Roughwood Farmhouse' and 'Barn to South West of Roughwood Farmhouse' and is located approximately 400m from to 'Warren House' and 'Monument to Captain Cook Approximately 70 Metres to North of The Vache'. Development at Site 1.08 would be likely to have a minor negative impact on the setting of these five Listed Buildings.

B.10.1.3 Archaeological Notification Site: Site 1.08 is located adjacent to an ANS, 'The Vache (park/garden)'. The proposed development at this site could potentially alter the setting of this ANS and therefore, have a minor negative impact on local archaeological features.

B.10.2 SA Objective 2 - Landscape

B.10.2.1 AONB: The majority of Site 1.08 is located within the Chilterns AONB. Development within a nationally designated landscape would be expected to have a major negative impact on the natural beauty and special qualities of the AONB.

- B.10.2.2 Landscape Character:** Site 1.08 is located within the LCT ‘Rolling Farmland’ and LCA ‘Little Chalfont’. The overall strategy for this LCA 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”*. The proposed development at Site 1.08 would be likely to be discordant with the guidelines and key characteristics of this LCA as the site comprises large areas of farmland. Therefore, a minor negative impact on the local landscape character would be expected.
- B.10.2.3 Views from the PRoW Network:** Several short PRoWs are located within Site 1.08. The development proposed at this site could potentially result in the loss of some of these footpaths, as well as alter the views experienced by users of the surrounding PRoW network. As a result, a minor negative impact on the local landscape would be expected.
- B.10.2.4 Views for Local Residents:** The proposed development at Site 1.08 would be likely to alter the views experienced by local residents, in particular at Burtons Lane, Long Walk, Harwood Road, Loudhams Wood Lane, Village Way, Oakington Avenue and Lodge Lane. Therefore, a minor negative impact on the local landscape would be expected.
- B.10.2.5 Coalescence:** Site 1.08 is located between Little Chalfont and Chorleywood. The proposed development at the site could potentially increase the risk of coalescence between these two settlements and therefore have a moderate negative impact on the local landscape.
- B.10.2.6 Urban Sprawl:** Site 1.08 is a large site located to the south east of Little Chalfont. The proposed development at this site would be likely to increase the risk of urban sprawl into the surrounding countryside and therefore, have a minor negative impact on the local landscape

B.10.3 SA Objective 3 – Biodiversity and Geodiversity

- B.10.3.1 Ancient Woodland:** Site 1.08 coincides with several stands of ancient woodland as well as located adjacent to ‘Pollards/ Bailey Woods’. The proposed development at this site would be likely to result a loss of ancient woodland and therefore, a major negative impact would be expected.

B.10.3.2 **BNS/ LWS:** Site 1.08 is located adjacent to the BNS ‘Pollards and Bailey Woods’. The proposed development at this site could potentially increase development related threats and pressures to this BNS and therefore have a minor negative impact on local biodiversity.

B.10.3.3 **Priority Habitats:** Site 1.08 coincides with numerous stands of deciduous woodland and traditional orchard priority habitats. Development at this site would be likely to result in the loss of these habitats and therefore have a minor negative impact on the overall presence of priority habitats within the Plan area.

B.10.4 **SA Objective 4 – Climate Change Mitigation**

B.10.4.1 **Carbon Emissions:** Site 1.08 is proposed for the development of between 3,000 and 4,000 dwellings. This would be likely to have a major negative impact on carbon emissions across the Plan area as the development proposal would be expected to result in an increase in carbon emissions of over 1% in comparison to current levels.

B.10.5 **SA Objective 5 – Climate Change Adaptation**

B.10.5.1 **Fluvial Flooding:** Site 1.08 is located wholly within Flood Zone 1. A minor positive impact would therefore be expected, as development at this site would be likely to locate site end users away from areas at risk of flooding.

B.10.5.2 **Surface Water Flooding:** Areas of Site 1.08 have been identified as being at low, medium and high risk of surface water flooding. Development at this location would be likely to have a major negative impact on pluvial flood risk. This negative impact would be associated with the exacerbation of pluvial flooding in surrounding locations as well as the proposed development potentially locating site end users in areas at high risk of surface water flooding.

B.10.6 **SA Objective 6 – Natural Resources**

B.10.6.1 **Previously Developed Land:** Site 1.08 comprises approximately 163ha, the majority of which is previously undeveloped land. The proposed development at this site would be likely to result in a major negative impact on natural resources due to the loss of 20ha or more of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

B.10.6.2 **ALC:** Site 1.08 is primarily situated on ALC Grade 3 land which is considered to be some of Chiltern and South Bucks' BMV land. A moderate negative impact would therefore be expected as development at this site would be likely to result in the permanent and irreversible loss of this important natural resource.

B.10.7 SA Objective 7 – Pollution

B.10.7.1 **Railway Line:** The north of Site 1.08 is located adjacent to a railway line. Development at this site could potentially expose some site end users to elevated levels of noise and vibration, therefore a minor negative impact would be anticipated.

B.10.7.2 **Groundwater SPZ:** Site 1.08 is located within the outer zone (Zone II) of a groundwater SPZ. The proposed development could potentially result in a minor negative impact on groundwater quality at this site.

B.10.7.3 **Air Pollution:** Site 1.08 is proposed for the development of between 3,000 and 4,000 dwellings and a major negative impact on local air quality would therefore be expected.

B.10.8 SA Objective 8 – Waste

B.10.8.1 **Waste:** Site 1.08 is proposed for the development of between 3,000 and 4,000 dwellings and would be likely to increase household waste generation in the Plan area by over 1% in comparison to current levels. Therefore, a major negative impact on waste generation would be expected.

B.10.9 SA Objective 9 – Transport and accessibility

B.10.9.1 **Bus Stop:** Site 1.08 is located outside the 400m target distance of a bus stop providing hourly services. The development proposed at this site could potentially restrict site end users' access to a regular bus service and therefore have a minor negative impact on local transport and accessibility.

B.10.9.2 **Railway Station:** The closest railway station to Site 1.08 is Chalfont and Latimer Station and Underground. The south of Site 1.08 is located outside the target distance this railway station. Therefore, the development proposed at this site would be expected to locate some site end users in

an area with poor access to rail services and as such, have a minor negative impact on transport and accessibility.

B.10.9.3 Pedestrian Access: Site 1.08 currently has poor access to the surrounding footpath network. The proposed development could potentially restrict site end users' access to this network, resulting in a minor negative impact on local accessibility.

B.10.9.4 Road Network: Site 1.08 is well connected to the existing road network. The proposed development would therefore provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

B.10.9.5 Local Services: Site 1.08 is located outside of the 600m target distance to local services. The majority of the site is located over 2km from the nearest local services, One Stop Community Stores and Little Chalfont Post Office. The development proposed at this site would be expected to locate site end users in an area with limited access to local services and as such, have a minor negative impact on accessibility.

B.10.10 SA Objective 10 – Housing

B.10.10.1 Net Gain: Site 1.08 is proposed for the development of between 3,000 and 4,000 dwellings and would therefore be expected to result in a major positive impact on the provision of housing in Chiltern and South Bucks.

B.10.11 SA Objective 11 – Health

B.10.11.1 NHS Hospital: The closest NHS hospital with an A&E department to Site 1.08 is the Wexham Park Hospital. This is located approximately 14km to the south. Development at this site would be expected to restrict the access of site end users to this essential health service and therefore a minor negative impact would be anticipated.

B.10.11.2 GP Surgery: Little Chalfont is served by the Little Chalfont Surgery. The majority of Site 1.08 is located over 800m from this surgery. Development at this site would be likely to restrict the access of some site end users to this essential health service and therefore a minor negative impact would be expected.

- B.10.11.3 **Leisure Centre:** The closest leisure centre to Site 1.08 is The Chiltern Pools. This is located approximately 4.2km north west of the site. Development at this site would therefore be expected to restrict the access of site end users to leisure centres and as such, have a minor negative impact on the health and wellbeing of local residents.
- B.10.11.4 **AQMA:** Site 1.08 is not located in close proximity to an AQMA and therefore a minor positive impact would be expected for the health and wellbeing of site end users.
- B.10.11.5 **Main Road:** The majority of Site 1.08 is not located in close proximity to a main road. An insignificant proportion of the site to the north is located within 200m of the A404. Overall, development at this site would therefore be expected to locate site end users away from traffic related sources of air pollution and therefore have a minor positive impact on health and wellbeing would be expected.
- B.10.11.6 **Net Loss of Public Greenspace:** The north of Site 1.08 coincides with a parcel of public greenspace, ‘Golf Course’. Development proposed at this site could potentially result in the complete loss of this resource and have a minor negative impact on the health and wellbeing of the local community.
- B.10.11.7 **Access to Public Greenspace:** Site 1.08 is partially located outside the target distance to a public greenspace. Development at this site would be likely to restrict access for some site end users to outdoor space and a diverse range of natural habitats. This could potentially have a minor negative impact on the health and wellbeing of local residents.
- B.10.11.8 **Access to PRow/ Cycle Network:** Site 1.08 is located in close proximity to the PRow network and/ or cycle network. The proposed development at this site would be likely to provide site end users with good access to these networks, encourage physical activity and as a result, have a minor positive impact on the health and wellbeing of local residents.
- B.10.12 SA Objective 12 – Economy**
- B.10.12.1 **Primary Employment Location:** There are a number of key employment locations within the target distance of Site 1.08. These are situated within Amersham, Little Chalfont and the surrounding area. The proposed development at this site would therefore be expected to locate site end

users in an area with good access to employment opportunities and have a minor positive impact on the local economy.

B.10.12.2 Primary Education: The majority of Site 1.08 is located outside the target distance to a primary school. The northern section of the site is located within the target distance of Little Chalfont Primary School, however, the nearest primary schools to the south of the site are located in Chorleywood and Chalfont St Giles. The proposed development at this site would therefore place new residents in a location with poor access to some primary education, and therefore a minor negative impact would be anticipated.

B.10.12.3 Secondary Education: Approximately half of Site 1.08 is located within the target distance of Dr Challoner’s High School; however, this is a school only for girls. The site is located outside the target distance to the nearest mixed-gender secondary school, Amersham Secondary School, which is located to the north west. The proposed development at this site would therefore place new residents in a location with poor access to secondary education, and therefore a minor negative impact would be anticipated.

B.10.13 Post-Mitigation

Site Reference	1 Cultural heritage	2 Landscape	3 Biodiversity & Geodiversity	4 Climate Change Mitigation	5 Climate Change Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport and Accessibility	10 Housing	11 Health	12 Economy
1.08	0	--	0	---	+	---	---	---	-	+++	-	-

Table B.10.1: The mitigating impact of policies within the Chiltern and South Bucks Local Plan for Site 1.08.

SA Obj.	Mitigating DMPolicy
1. Cultural Heritage	<ul style="list-style-type: none"> • Policies DM DP1 and DM DP13 would help to ensure development located in close proximity to heritage assets is in keeping with the local character. • Policies DM DP2 and DM DP4 would be expected to mitigate negative impacts on heritage assets and their setting. • Policy DM DP3 would be expected to mitigate negative impacts on heritage features with archaeological interest.
2. Landscape	<ul style="list-style-type: none"> • Policy DM NP1 would help to ensure that development within the Chilterns AONB conserves or enhances its special qualities. • Policy DM DP13 would be expected to minimise negative impacts on views experienced by users of the PRow network, and ensure development is well-integrated with the local landscape character. • Policies DM DP13 and DM DP16 would be expected to minimise negative impacts on views experienced by local residents as a result of development. • Policy DM DP7 may help to reduce some negative impacts associated with transition of new development and the countryside, associated with urban sprawl and coalescence, but would not be expected to fully mitigate these impacts.
3. Biodiversity	<ul style="list-style-type: none"> • Policy DM NP5 would be expected to mitigate any loss of or damage to protected trees. • Policy DM NP4 would be expected to mitigate any negative impacts on designated or non-designated sites including important habitats or species.
4. Climate Change Mitigation	<ul style="list-style-type: none"> • Policies DP5, DP6 and DP9 would be expected to help reduce increases in carbon footprint that may occur as a result of development, but would not be expected to fully mitigate these impacts.
5. Climate Change Adaptation	<ul style="list-style-type: none"> • Policies DM NP8 and DM DP5 would be expected to mitigate negative impacts on surface water flooding that may arise as a result of development.
6. Natural Resources	<ul style="list-style-type: none"> • Policy DM DP7 may help to increase the efficient use of land, however policies within the Local Plan would not be expected to mitigate the loss of greenfield land or ALC Grade 3 land.
7. Pollution	<ul style="list-style-type: none"> • Policies DM NP6 and DM NP9 would be expected to mitigate any negative impacts on groundwater quality. • Policy DM NP9 may help to combat increases in air pollution, however, this would not be expected to fully mitigate air pollution associated with development. • Policies within the Local Plan would not be expected to mitigate pollution associated with proximity to railway lines.
8. Waste	<ul style="list-style-type: none"> • Policy DM DP19 would help to ensure recycling storage is provided, however this would not be expected to mitigate the increase in household waste associated with new development.

SA Obj.	Mitigating DMPolicy
9. Transport	<ul style="list-style-type: none"> • Policies within the local plan would not be expected to mitigate restricted access to railway stations. • Policy DM DP14 may result in some improved access to local services and bus stops, however, would not be expected to fully mitigate. • Policies DM CP2, DM DP11, DM DP12 and DM DP14 would be expected to improve safe access for pedestrians and cyclists.
11. Health	<ul style="list-style-type: none"> • Policies DM DP14 and DM DP10 may help to identify and improve access to some health facilities, however, would not be expected to fully mitigate the poor access to NHS hospitals, GP surgeries and leisure facilities. • Loss of public greenspace as a result of development contradicts Policy DM HP1, and as such would not be expected to be mitigated.
12. Economy	<ul style="list-style-type: none"> • Policies within the Local Plan would not be expected to mitigate the restricted access to primary and secondary schools.

Appendix E: Strategic Policy Assessments

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E.11 Policy SP BP6 – Little Chalfont

1	2	3	4	5	6	7	8	9	10	11	12
Cultural Heritage	Landscape	Biodiversity & Geodiversity	Climate Change Mitigation	Climate Change Adaptation	Natural Resources	Pollution	Waste	Transport & Accessibility	Housing	Health	Economy
0	--	0	--	+	---	--	--	++	+++	++	+

Policy SP BP6 – Little Chalfont

Land to the south-east of Little Chalfont, as shown on the Policies Map, is allocated for residential-led use for approximately 700 homes, a primary school as part of multi-functioning community hub and 15 pitches for Gypsies and Travellers. Planning permission for a residential-led development will be granted provided that the following site-specific requirements are agreed through the masterplan process and form part of the planning application:

- a) an integrated, coordinated and comprehensive planning approach will be taken to the site. The site will require a single masterplan to ensure this is delivered and a high quality design outcome achieved;
- b) retention of employment uses on the existing employment land;
- c) sustainable transport, provision, where appropriate and required, to improve sustainable transport options between employment, services, housing and onward travel options, and highway improvement works including but not limited to:
 - i. improvements to the A404 / Burtons Lane junction;
 - ii. improvements to the A404 / Stony Lane/Church Grove junction;
 - iii. financial contribution towards improvements to the A413 / Stanley Hill / A355 roundabout;
 - iv. financial contribution towards improvements to the A413 / A355 / Gore Hill roundabout;
 - v. financial contributions towards improvements to local bus services; vi. bus stop infrastructure; and
 - vi. provision of a suitable pedestrian/cycleway linking the site to Little Chalfont Centre and services including Chalfont & Latimer Railway Station;
- d) criteria (i) to (vii) along with the transport impacts of the development will need to be assessed through local junction modelling as part of Transport Assessments, as agreed by the Highway Authority, to accompany planning

applications on this site and to demonstrate that access by all modes can be achieved;

- e) financial contributions for primary health care facilities within the local area as agreed with the Clinical Commissioning Group;
- f) a community hub, including provision of at least a one form entry primary school and a nursery within a one hectare site with a safe drop off / pick up point in addition to the school site allocation;
- g) financial contributions to secondary school places as agreed with the Local Education Authority;
- h) provision of a Use Class A1 convenience store and other units within Use Classes A3 – A5 within a shopping parade of at least 500 square metres;
- i) a comprehensive landscaping scheme to include:
 - i. retention of important landscape features such as woodland, hedgerows and the dry valley;
 - ii. protection of Ancient Woodland through the provision of a minimum 30m buffer;
 - iii. strategic landscaping and open space to provide a buffer to the Chilterns AONB, particularly along the eastern edge of the site;
 - iv. replacement of exotic species in the former golf course;
 - v. long term management of landscape and open space features;
- j) Green Infrastructure, including the creation of new links between woodlands, and improvements to the public rights of way network between the development site and the AONB;
- k) a site-specific Flood Risk Assessment and appropriate mitigation; and
- l) provision of 15 pitches for Gypsies and Travellers, with access and provision of utility services.

E.11.1.1 This policy focuses on the provision of residential-led development at the south eastern settlement boundary of Little Chalfont, which includes the development of residential dwellings, Gypsy and Traveller pitches and associated social infrastructure, including road network improvements, public transport, school improvements and Green Infrastructure. This policy identifies a number of environmental constraints which must be kept in mind when allocating significant development, including the Chilterns AONB and surface water flood risk.

E.11.2 SA Objective 1 – Cultural Heritage

E.11.2.1 After consideration of the Local Plan DM policies, it would not be anticipated that development associated with this policy would have a significant effect on the local historic environment.

E.11.3 SA Objective 2 – Landscape

E.11.3.1 DM policies within the Local Plan, and the high-quality design outcome described in this policy, would be expected to minimise any adverse impacts on the setting of the nearby Chilterns AONB. However, this site comprises 45.8ha of previously undeveloped land, and therefore development would be expected to result in urban sprawl and coalescence with Chorleywood. As such, this policy would be expected to have a moderate negative impact on the local landscape overall.

E.11.4 SA Objective 3 – Biodiversity & Geodiversity

E.11.4.1 After consideration of the Local Plan DM policies, it would be expected that any adverse impacts on local biodiversity designations and priority habitats would be mitigated. This policy includes Green Infrastructure improvements and the provision of landscaped buffers. This policy aims to protect existing woodland, the Chilterns AONB and improve habitat connectivity. This would be expected to have an overall negligible impact on biodiversity, when taking into account the loss of existing habitat associated with the development of 700 new homes and associated infrastructure.

E.11.5 SA Objective 4 – Climate Change Mitigation

E.11.5.1 Improvements to public transport provision in the local area and the PRow network under this policy would be expected to help reduce reliance on personal car use. Therefore, this could potentially help to combat increases in road traffic associated GHG emissions. Furthermore, the creation of new Green Infrastructure would be expected to help offset the increased carbon emissions as a result of development, to some extent, by providing increased carbon storage capacity. However, these measures would not be expected to completely eradicate emissions associated with construction and occupation of development. Therefore, due the significant scale of the proposed development, a moderate negative effect on climate change mitigation would be expected.

E.11.6 SA Objective 5 – Climate Change Adaptation

E.11.6.1 DM policies within the Local Plan would be expected to mitigate surface water flood risk at this site. Additionally, this policy requires a site-specific Flood Risk Assessment to be carried out and corresponding mitigation measures. Therefore, a minor positive impact on climate change adaptation would be expected. Incorporation of new Green Infrastructure,

including woodland planting would also be expected to help reduce runoff and therefore further improve the sustainability performance of this site with regard to climate change adaptation.

E.11.7 SA Objective 6 – Natural Resources

E.11.7.1 The site allocation within this policy comprises 45.8ha of greenfield land. Development on previously undeveloped land would be expected to result in the loss of ecologically important soil. Furthermore, this site is located on ALC Grade 3 land, which is considered to be some of Chiltern and South Bucks’ BMV agricultural land. As the proposed development at this site would result in a loss of agriculturally important land, a major negative impact would be expected for this objective.

E.11.8 SA Objective 7 – Pollution

E.11.8.1 Public transport and footpath/cycle path improvements within this policy would be expected to help reduce site end users’ reliance on personal car use. However, the proposed development of 700 homes would be expected to result in a net increase in vehicles and increase emissions associated with the construction and occupation of dwellings. Therefore, a moderate negative impact would be expected for this objective.

E.11.9 SA Objective 8 – Waste

E.11.9.1 The proposed development of 700 homes under this policy would be expected to result in significant increase in household waste across the Plan area. This policy along with other DM policies within the Local Plan, would not be expected to combat adverse impacts associated with this increase. Therefore, a moderate negative impact on waste generation would be expected.

E.11.10 SA Objective 9 – Transport & Accessibility

E.11.10.1 The improvements to sustainable transport options between proposed housing and employment, services and onward travel options under this policy would be expected to have a moderate positive impact on transport and accessibility. This would include the provision of bus stops, altered bus routes which therefore would be expected to improve access to railway stations for onward travel.

E.11.11 SA Objective 10 – Housing

E.11.11.1 This policy includes the development of 700 new houses. Therefore, this would be expected to have a major positive impact on housing provision across the Plan area.

E.11.12 SA Objective 11 – Health

E.11.12.1 Upgrades to the PRow and cycle networks would help to encourage walking and cycling in the local area, which would be expected to have physical and mental health benefits for site end users. This would also be expected to help reduce site end users' reliance on car use and therefore reduce traffic associated emissions to some extent. Furthermore, improvements to the sustainable transport options in conjunction with financial contributions for primary healthcare facilities would also help to improve site end users' access to NHS hospitals, GP surgeries and leisure centres. As a result a moderate positive impact on health would therefore be expected.

E.11.13 SA Objective 12 – Economy

E.11.13.1 This policy includes financial contributions towards primary and secondary school places. This would be expected to have a minor positive impact on the local economy by helping to improve site end users access to both primary and secondary education.

E.11.14 Supplementary Mitigation Considerations

E.11.14.1 A concept masterplan has been provided by JTP to the Councils for BP6 (undated).

E.11.14.2 The retention of existing Green Infrastructure, such as woodland, would be expected to have positive impacts by attenuating surface water flood risk as well as filtering air and storing carbon. The retention of woodland and trees would also be expected to improve the sustainability performance of this site in terms of biodiversity, air pollution and flood risk. The site plan proposes development to be located outside of the identified surface water flood risk areas, and therefore would be likely to have a positive impact by ensuring local residents are not located in areas at risk of flooding. The proposal for a primary school located to the north of the site would be expected to improve site end users' access to primary education and as such, mitigate any adverse impacts previously identified. Retention of existing employment land would be likely to have a positive

impact on the local economy. The provision of a community centre within the site would also be likely to benefit community cohesion, leading to positive impacts on the wellbeing of local residents. The provision of footpaths would be likely to ensure safe pedestrian access for all site end users which would have a positive impact on the health of local residents by encouraging active lifestyles, as well as providing sustainable transport links.

Appendix 11 Extracts from Buckinghamshire Green Belt Assessment, 2016

The Buckinghamshire Authorities
**Buckinghamshire Green Belt
Assessment**

Report: Methodology and
Assessment of General Areas

242378-4-05

Issue | 7 March 2016

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 242368-00

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ARUP



1 Introduction

1.1 Background

1.1.1 Arup has been appointed by The Buckinghamshire Authorities (Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Wycombe District Council, and Buckinghamshire County Council) to undertake a Green Belt Assessment to form part of a shared evidence base for forthcoming local plans in each of the four Buckinghamshire districts and the Buckinghamshire Replacement Minerals and Waste Local Plan.

1.1.2 In broad terms, the Green Belt Assessment will be undertaken in two phases:

- Part 1, the focus of this report, will assess strategic land parcels, ‘General Areas’, against the purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF). This assessment will identify the relative performance of the General Areas against the NPPF defined purposes of the Green Belt;
- Part 2 would ultimately be carried out by the local authorities themselves or would be subject of a separate procurement exercise (or exercises) by the Buckinghamshire Authorities. Arup has been commissioned to carry out Part 1 only and Part 2 does not form part of the current Study.

1.1.3 This report sets out the methodology and findings for Part 1 of the Green Belt Assessment (the ‘Study’).

1.2 Purpose of Study

1.2.1 The purpose of a Green Belt Assessment is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy; planning authorities may then take this into account alongside other evidence in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. However, equally a Green Belt Assessment may conclude that no changes are appropriate.

1.2.2 The Green Belt Assessment provides an independent and objective appraisal of all the existing Green Belt land as well as non-Green Belt land within Buckinghamshire. This report has been undertaken in accordance with the Study brief, which is clear in its aspirations to:

- Draw on best practice in Green Belt assessments in order to establish a robust methodology for assessing the Green Belt in Buckinghamshire against the five purposes of the Green Belt established in the NPPF;
- Identify and delineate logical and justified parcels of Green Belt land for assessment, review each land parcel against the five Green Belt purposes, evaluate and score the individual land parcels and

present clear, comprehensive and fully justified conclusions on the performance of each land parcel;

- Consider whether land not currently within the Green Belt fulfils Green Belt purposes, specifically around major settlements at the outer edges of the Green Belt.

1.3 Report Structure

1.3.1 Following this introduction, this report is structured as follows:

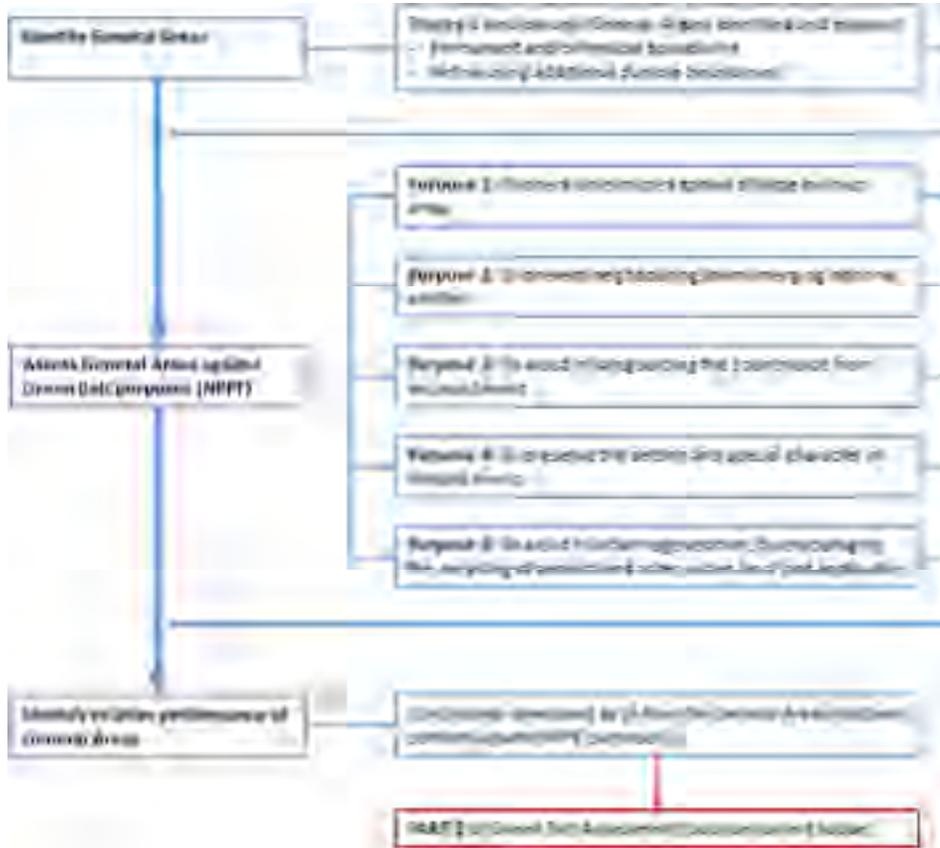
- Chapter 2 provides the policy context at the national and local level, together with a summary of Green Belt Assessments undertaken by neighbouring authorities.
- Chapter 3 sets out the context for this Study, including the history of the Green Belt as a whole and specifically within Buckinghamshire.
- Chapter 4 sets out the methodology for the Study.
- Chapter 5 sets out the key findings of the Study.
- Chapter 6 provides recommendations for further work.
- Chapter 7 sets out the conclusions of the Study.
- Annex Report 1 (parts A – G) contains the Green Belt General Area Assessment pro-formas.

4 Methodology

4.1 Introduction

4.1.1 The following section sets out the methodology which was used to undertake the Green Belt Assessment in Buckinghamshire. An overview of the methodology is set out in Figure 4.1.

Figure 4.1: Methodology Overview



4.2 Methodology Changes

4.2.1 The methodology for the Green Belt Assessment was previously published on 11th August 2015. Subsequently, as the Study has emerged, some minor changes to this have been required. This section highlights a number of minor alterations made to the published methodology, all of which are integrated into the following sections of this report:

- Several non-Green Belt and Green Belt settlements, omitted erroneously from Maps 4.4a and 4.4b, have been added;
- Non-Green Belt settlements have now been listed out in their entirety in Table 4.2;

- Footnote 21, which described the assessment process for General Areas against Purpose 3, was amended to reflect a more balanced approach to quantitative and qualitative methods applied in practice during the assessments.

PART 1: Parcel Definition & NPPF Assessment

4.3 Identify General Areas

4.3.1 The scope for this review was to consider all Green Belt land, as defined in the current adopted local plans for the four Buckinghamshire districts (Map 4.1 on page 45), as well as non-Green Belt land that might be considered for inclusion in the Green Belt. The starting point for assessing land against the NPPF purposes was to identify strategic land parcels or ‘General Areas’ for appraisal.

Green Belt

4.3.2 The percentage of land designated as Green Belt varies significantly between the four districts, ranging from 88.4% of Chiltern to less than 10% of Aylesbury Vale. All of this land has been included in the assessment, including 16 Major Developed Sites (MDS) in the Green Belt identified in the respective District local plans by Chiltern District Council, South Bucks District Council and Wycombe District Council respectively.¹⁰

4.3.3 Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus, permanent man-made and natural features were selected as the initial basis of criteria for the identification of the ‘General Areas’. In particular, the boundaries of the General Areas were based on the following features:

- Motorways;
- A and B Roads;
- Railway lines;
- River Chess;
- River Colne;
- River Misbourne;
- River Thames; and
- River Wye.

¹⁰ The 16 MDS are: Land at Amersham and Wycombe College (Chiltern); Newland Park, Chalfont Common (Chiltern); Wilton Park, Beaconsfield (South Bucks); Mill Lane, Taplow (South Bucks); Court Lane, Iver (South Bucks); Molins, Saunderton (Wycombe); Janssen - Cilag, Saunderton (Wycombe); Wycliffe Centre, Horsleys Green (Wycombe); RAF High Wycombe, Walter’s Ash (Wycombe); Little Marlow Sewage Works (Wycombe); Wycombe Air Park (Wycombe); Wycombe West School, Downley (Wycombe); Uplands Conference Centre, Four Ashes (Wycombe); Pipers Corner School, Great Kingshill (Wycombe); Binders Yard, Cryers Hill (Wycombe); Amersham & Wycombe College, Flackwell Heath (Wycombe).

These features are illustrated spatially in Map 4.2 on page 46.

4.3.4 Given the extremes of urban and rural found in Buckinghamshire, from the semi-urban fringes of Slough in the south of the county to the relatively unspoilt countryside in the Chilterns, a more flexible approach to the identification of General Areas for assessment was necessary, particularly in the environs of the major non-Green Belt settlements (see Table 4.2).

4.3.5 This was achieved through the further division of some General Areas in and around non-Green Belt settlements using additional durable boundary features such as:

- Unclassified public roads and private roads;
- Smaller water features, including streams, canals and other watercourses;
- Prominent physical features (e.g. ridgelines);
- Existing development with strongly established, regular or consistent boundaries;
- Protected woodland or hedgerows.

This process took into account local context and involved an element of professional judgement, and agreement was sought from members of the Steering Group with regard to all such changes to the original General Areas for assessment. In the rural areas, assessment was against the larger, 'strategic' General Areas.

4.3.6 In some cases, boundary features are located close together, for example where roads, rivers, and/or railway lines run closely parallel to each other. These features were taken together to form one boundary rather than separately which would lead to small slithers of Green Belt land which would not form logical General Areas for assessment.

4.3.7 It was agreed with the Buckinghamshire Authorities to consider the proposed A355 Relief Road at Wilton Park as appropriate during the assessment. The project has committed Government funding and planning permission for the first phase of the new road was granted in October 2014, which may have implications for the division of land around Beaconsfield into General Areas. It was also agreed not to consider HS2 during the creation of General Areas, given the on-going uncertainty over the exact route and supporting development at this stage.

4.3.8 Following the described process of identification, modification and sub-division, the Green Belt General Areas utilised for the assessment are illustrated spatially in Maps 4.3a and 4.3b on pages 47-48.

Non-Green Belt

4.3.9 Based on previous experience of conducting Green Belt Assessments, the starting point for identifying non-Green Belt land was open land outside of the defined settlement limits set out in the four districts' local plans, but not included in the Green Belt, as well as any previous

Green Belt work undertaken by the authorities to identify potential boundary revisions.

- 4.3.10** Based on research, combined with discussion with the Steering Group, it was felt that, in general, four sites previously reserved for housing on the edge of urban areas in Wycombe were consistent with this criteria and should be assessed against the Green Belt purposes.
- 4.3.11** Aside from this, existing Green Belt boundaries were deemed to be drawn sufficiently tightly to the built environment to negate any further investigation within existing settlement limits.
- 4.3.12** However, it was also noted through consultation with wider stakeholders and liaison with Wycombe District Council and Aylesbury Vale District Council that the furthest northern and western boundaries of the Green Belt, particularly around the settlements of Wendover, Monks Risborough / Princes Risborough, and Leighton Linlade (in Central Bedfordshire) may not adequately prevent sprawl and that non-Green Belt land beyond the Green Belt boundaries may have the potential to meet Green Belt purposes. The methodology provided a flexible approach to the identification of non-Green Belt land for assessment around the identified settlements.
- 4.3.13** The non-Green Belt General Areas utilised for the assessment are illustrated spatially in Maps 4.3a and 4.3b on pages 47-48.

4.4 Assess General Areas

4.4.1 Each of the General Areas were assessed against the NPPF purposes for Green Belt. There is no national guidance which establishes exactly how such an assessment should be undertaken. The PAS guidance, recent examples and previous experience reiterates the need to respect local circumstances and the unique characteristics that affect the way that the NPPF purposes of the Green Belt are appraised.

4.4.2 The purpose of the assessment was to establish any differentiation in terms of how the General Areas in the existing Green Belt function and fulfil the purposes of the Green Belt at a strategic level. For those General Areas outside of the current Green Belt the assessment considered how these strategic land parcels might fulfil the purpose if designated.

4.4.3 For each purpose, one or more criteria were developed using both qualitative and quantitative measures. A score out of five was attributed for each criterion (Figure 4.2), where 1 equals least fulfils criterion and 5 equals most fulfils criterion. If a General Area was considered to have no contribution to a specific purpose, a statement was added to the pro-forma to this effect and no score (a score of zero) was attributed.

4.4.4 It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement was necessary to determine whether, overall, General Areas were meeting Green Belt purposes strongly or not. A rule of thumb was applied, whereby:

- 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 (see 4.4.5);
- a General Area fulfilling the criteria to a lesser extent (scores of 2 or below) across all purposes was deemed to be weaker Green Belt and was recommended for further consideration in Part 2.

4.4.5 Where General Areas were judged as meeting Green Belt purposes, or meeting purposes strongly, consideration was given to the identification of smaller sub-areas within General Areas which may have the potential to score differently to the General Areas as a whole and might be suitable for further consideration.

Figure 4.2: Criterion Scores

Overall Strength of General Area against criterion	Score	Equivalent Wording
	0	Does Not Meet Purpose
	1	Meets Purpose Weakly
	2	Meets Purpose Relatively Weakly
	3	Meets Purpose
	4	Meets Purpose Relatively Strongly
	5	Meets Purpose Strongly

4.4.6 The following sections examine the definition of each of the five purposes of the Green Belt in relation to local objectives and role of the Green Belt in terms of achieving its purpose locally; and set out the criteria and associated scoring applied. The criteria and scores were discussed and refined in collaboration with the Steering Group, as well as officers from neighbouring and partnering authorities following a workshop session on 1st April 2015.¹¹

Purpose 1 Assessment

Purpose 1: To check unrestricted sprawl of large built-up areas.

4.4.7 The original strategic purpose of the Metropolitan Green Belt was to check the sprawl of London. However, given only a relatively small part of Buckinghamshire is directly adjacent to Greater London, this assessment instead considered the role of General Areas in restricting the sprawl of large built-up areas within the four Buckinghamshire districts and within neighbouring local authorities. These were defined to correspond to the Tier 1 settlements identified in the respective Local Plans for each local authority, both within and outside Buckinghamshire, to ensure a robust and evidence-based approach to the assessment (see Map 4.4; Table 4.1)¹².

4.4.8 Although ‘sprawl’ is a multi-faceted concept and thus has a variety of different definitions, this Study has adopted a simple definition, considering sprawl as ‘*the outward spread of a large built-up area at its periphery in an untidy or irregular way*’. In order to appraise the extent to which the Green Belt keeps this in check, it is necessary to consider:

- a) Whether a General Area falls at the edge of one or more distinct large built-up areas;
- b) The degree to which the General Area is contained by built-form, and the nature of this containment, as well as the linkage to the wider Green Belt, as well as the extent to which the edge of the

¹¹ The following local authorities / stakeholders were represented at the workshop on 1st April 2015: Bracknell Forest Council; Central Bedfordshire Council; London Borough of Hillingdon; Milton Keynes Council; Oxfordshire County Council; Royal Borough of Windsor and Maidenhead; Slough Borough Council; Three Rivers District Council; Watford Borough Council; Buckinghamshire Thames Valley LEP.

¹² These were confirmed with officers from the respective neighbouring authorities at a workshop held on 1st April 2015.

built up area has a strongly defined, regular or consistent boundary.

Table 4.1: Large Built-Up Areas Considered in Purpose 1 Assessment

Buckinghamshire	Buckinghamshire and Neighbouring Local Authorities	Neighbouring Local Authorities
Amersham	Burnham / Slough (Slough) ¹³	Hemel Hempstead (Dacorum) ¹⁵
Beaconsfield / Knotty Green		
Chesham	Greater London (LB Hillingdon) / New Denham ¹⁴	Leighton Linlade (Central Bedfordshire)
Gerrards Cross / Chalfont St Peter		Maidenhead (RB Windsor and Maidenhead) ¹⁶
High Wycombe (encompassing High Wycombe, Hazlemere, Tylers Green, Downley, Holmer Green, Loudwater, Widmer End, and Wooburn Green)		Rickmansworth (Three Rivers) ¹⁷
Marlow		Windsor (RB Windsor and Maidenhead) ¹⁸
Princes Risborough / Monks Risborough		
Wendover		

4.4.9 There are two stages in this assessment:

Assessment 1(a)

4.4.10 Firstly, a Green Belt land parcel must be at the edge of one or more distinct large built-up areas in order to prevent development which would constitute sprawl. This criterion must therefore be met for Purpose 1 to be fulfilled and was applied on a *Pass/Fail* basis.

¹³ For the purposes of the assessment, Burnham was treated as one large built-up area together with Slough, which lies outside of South Bucks District.

¹⁴ For the purposes of the assessment, this includes all constituent parts of the continuous built-up area of Greater London within Hillingdon (including (but not limited to) Uxbridge, Ickenham, Hillingdon, Hayes, West Drayton, Ruislip and Northwood) and South Bucks District (New Denham and Willowbank, which is referred to as 'New Denham' throughout the assessment proformas and mapping).

¹⁵ Hemel Hempstead is identified as the Main Centre in the settlement hierarchy of the Dacorum Core Strategy (2013).

¹⁶ Maidenhead is identified as a Town Centre in Hierarchy of Centres of the Borough Local Plan Preferred Options (2014).

¹⁷ Rickmansworth is identified as a Principal Town in the settlement hierarchy of the Three Rivers Core Strategy (2011)

¹⁸ Windsor is identified as a Town Centre in Hierarchy of Centres of the Borough Local Plan Preferred Options (2014).

Assessment 1(b)

4.4.11 As stated at Assessment 1(a), Green Belt should function to protect open land at the edge of large built-up areas (Table 4.1). However, the extent to which a General Area prevents sprawl is dependent on its relationship with the respective built-up areas.

4.4.12 Assessment 1(b) initially focused on the degree to which Green Belt abuts built-up areas, the nature of this relationship and links to the wider Green Belt. The following criteria were used for assessment:

- A General Area 'contiguous' with, in other words, predominantly surrounded or enclosed by two or more distinct areas of built form but that also retains a strong link to the wider Green Belt, would play a particularly important role in preventing sprawl.
- A General Area 'connected' with a large built-up area, or displaying a low level of containment and rather simply adjoining the urban area, may prevent sprawl but to a lesser extent.
- A General Area 'enclosed' by a single built-up area, in other words, almost entirely contained or surrounded by built development which forms part of a single built-up area and has limited connections to the wider Green Belt, would only prevent sprawl to a limited extent (rather, potential development would likely be classified as infill).

4.4.13 This initial assessment was supplemented by additional analysis on the role of Green Belt in preventing sprawl which would not otherwise be restricted by another barrier. The NPPF states that Local Authorities should '*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*' (paragraph 85). Boundary identification reflected this, based on the following definitions:

- Examples of durable features (likely to be permanent):
 - Infrastructure: motorway; public and made road; a railway line; river.
 - Landform: stream, canal or other watercourse; prominent physical feature (e.g. ridgeline); protected woodland / hedge; existing development with strongly established, regular or consistent boundaries.
- Examples of features lacking in durability (soft boundaries):
 - Infrastructure: private / unmade road; power line.
 - Natural: field boundary, tree line.

4.4.14 Where sprawl would not otherwise have been restricted by a durable boundary feature, the extent to which the existing built form had strongly established or recognisable boundaries was assessed, based on the following definitions:

- 'Regular' or 'consistent' built form comprised well-defined or rectilinear built form edges, which would restrict development in the Green Belt.

- ‘Irregular’ or ‘inconsistent’ built form comprised imprecise or ‘softer’ edges, which would not restrict growth within the Green Belt.

Purpose 1 Assessment Criteria

4.4.15 The criteria used to assess the General Areas against Purpose 1 are set out below. Ordnance Survey base maps and aerial photography were reviewed in order to undertake each of these assessments, sense-checked through site visits.

Purpose 1 Assessment Criteria

Purpose	Criteria	Scores
To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas.	PASS: Land parcel meets Purpose 1. FAIL: Land parcel does not meet Purpose 1 and will score 0 for criteria (b).
	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.	5+: Land parcel is contiguous with (a) large built-up area(s). The large built-up area(s) is/are predominantly bordered by features lacking in durability or permanence. 5: Land parcel is contiguous with (a) large built-up area(s), though the large built-up area(s) is/are predominantly bordered by prominent, permanent and consistent boundary features. 3+: Land parcel is connected to one or more large built-up area(s). The large built-up area(s) is/are predominantly bordered by features lacking in durability or permanence. 3: Land parcel is connected to one or more large built-up area(s), though the large built-up area(s) is/are predominantly bordered by prominent, permanent and consistent boundary features. 1+: Land parcel is enclosed by one distinct large built-up area. The large built-up area is predominantly bordered by features lacking in durability or permanence. 1. Land parcel is enclosed by one distinct large built-up area, though the large built-up areas is predominantly bordered by prominent, permanent and consistent boundary features.
	Criterion Score	xx/5

Purpose 2 Assessment

Purpose 2: To prevent neighbouring towns merging into one another.

- 4.4.16** In addition to the clear function of this purpose in preventing towns from merging and therefore protecting existing gaps between towns, it also forms the basis for maintaining the existing settlement pattern. National policy provides no guidance over what might constitute ‘towns’ and whether this purpose should also take into consideration the gaps between smaller settlements. Historically, Buckinghamshire has been a predominantly rural area with a dispersed population across a number of distinct towns and smaller villages, which have retained their own distinctiveness, though there has been a degree of coalescence between settlements, particularly along major transport corridors and in the south of the county close to the larger towns of Slough and Maidenhead.
- 4.4.17** Given the dispersed settlement pattern, the assessment of General Areas primarily considered strategic gaps between all non-Green Belt settlements, but also included a more local interpretation of the purpose where instances of the Green Belt protecting gaps between smaller Green Belt settlements, regardless of size or function, were identified.
- 4.4.18** Both non-Green Belt and ‘washed over’ Green Belt settlements were identified through the appropriate local development plans and confirmed in consultation with the Steering Group, as follows:
- Aylesbury Vale District Council - Relevant non-Green Belt settlements and those identified in the Settlement Hierarchy (2012) published as evidence for the withdrawn Vale of Aylesbury Plan, as well as the more recent Draft Settlement Hierarchy (2015).
 - Chiltern District Council - All settlements listed in policy GB5 (Green Belt settlements) in adopted Local Plan (1997).
 - South Bucks District Council - All settlements identified in the settlement hierarchy in the adopted Core Strategy (2011).
 - Wycombe District Council - All non-Green Belt settlements and built-up areas identified in Policy GB4 (built-up areas within the Green Belt).
- 4.4.19** Settlements in neighbouring local authority areas adjacent to areas of Green Belt in Buckinghamshire were identified using adopted local development plans (Table 4.2; Maps 4.5A and 4.5B).¹⁹

¹⁹ These were confirmed with officers from the respective neighbouring authorities at a workshop held on 1st April 2015.

Table 4.2: Settlements Considered in Purpose 2 Assessment

Buckinghamshire	Neighbouring Local Authorities
Non-Green Belt Settlements	Non-Green Belt Settlements
Amersham	Berkamstead (Dacorum)
Ashton Clinton	Bovingdon (Dacorum)
Aylesbury	Chorleywood (Three Rivers)
Beaconsfield / Knotty Green	Cookham (RB Windsor and Maidenhead)
Bourne End / Wooburn	Cornbrook / Poyle (Slough)
Burnham / Slough ²⁰	Dunstable (Central Bedfordshire)
Chalfont St Giles	Eton Wick (RB Windsor and Maidenhead)
Chesham ²¹	Harefield (LB Hillingdon)
Denham Green	Ickenham (LB Hillingdon)
Farnham Royal / Farnham Common ²²	Leighton Linlade (Central Bedfordshire)
Flackwell Heath	Maidenhead (RB Windsor and Maidenhead)
Gerrards Cross / Chalfont St Peter	Maple Cross (Three Rivers)
Great Kingshill	Ringshall
Great Missenden / Prestwood	South Harefield (LB Hillingdon)
High Wycombe (encompassing High Wycombe, Hazlemere, Tylers Green, Downley, Holmer Green, Loudwater, Widmer End, and Wooburn Green)	Tring (Three Rivers)
Holmer Green	Uxbridge (LB Hillingdon)
Iver Heath ²³	West Drayton (LB Hillingdon)
Iver Village ²⁴	Wigginton (Three Rivers)
Ivinghoe	Windsor (RB Windsor and Maidenhead)
Lane End	
Little Chalfont	
Longwick	
Marlow	
Marlow Bottom	
Princes Risborough / Monks Risborough	
Richings Park	
Seer Green	
Soulbury	
Stoke Poges	
Stokenchurch	

²⁰ Burnham is within South Bucks District but, for the purposes of the assessment, was treated as one settlement together with Slough.

²¹ Chesham includes the settlement of 'Nashleigh Hill / Lycrome Road (Chesham)', identified in Chesham Local Plan policy GB5, considered part of Chesham for the purposes of this assessment.

²² Farnham Royal and Farnham Common are identified as separate settlements in the South Bucks Core Strategy Settlement Hierarchy but, for the purposes of this assessment, were treated as one settlement.

²³ 'Wood Lane Close (Iver)', identified in adopted Core Strategy settlement hierarchy, considered part of Iver Heath for the purposes of this assessment.

²⁴ Referred to as 'Iver' in assessment pro-formas and mapping.

Buckinghamshire	Neighbouring Local Authorities
Uxbridge (LB Hillingdon) / New Denham (South Bucks) ²⁵ Walter's Ash / Naphill Wendover Weston Turville Wing	
Green Belt Settlements Beacons Bottom / Studley Green Bledlow Ridge Botley Bovingdon Green Claymoor / Clayhill Cryers Hill Dagnall Denham ²⁶ Dorney Reach Dorney Village ²⁷ Fulmer George Green Halton Hedgerley Hill Higher Denham Hughenden Valley Hyde Heath Jordans Lacey Green / Loosley Road ²⁸ Ley Hill Little Kingshill Little Marlow Piddington South Heath Speen Taplow Riverside Taplow Village Tatling End West Wycombe Wexham (Church Lane / Wexham Park Lane) ²⁹	Green Belt Settlements Bisham (RB Windsor and Maidenhead) Flaunden (Dacorum) Holywell (Central Bedfordshire) Hurley (RB Windsor and Maidenhead) Kensworth (Central Bedfordshire) Sarratt (Three Rivers) Studham (Central Bedfordshire) Wiggington (Dacorum)

²⁵ New Denham is within South Bucks District but, for the purposes of the assessment, was treated as one settlement together with Uxbridge. 'New Denham' refers to the settlement of New Denham and Willowbank, identified in the South Bucks Core Strategy Settlement Hierarchy.

²⁶ Comprises settlements identified as 'Denham (South of Village)' and 'Denham Village' in South Bucks Settlement Hierarchy.

²⁷ Referred to as 'Dorney' in assessment pro-formas and mapping.

²⁸ Identified as separate settlements in Wycombe Local Plan; however considered as one settlement for the purposes of the assessment.

²⁹ Referred to as 'Wexham' in assessment pro-formas and mapping.

Buckinghamshire	Neighbouring Local Authorities
Wexham Street Winchmore Hill	

4.4.20 The extent to which an area of Green Belt protects a land gap was assessed using the following definitions:

- ‘Essential gaps’, where development would significantly reduce the perceived or actual distance between settlements.
- ‘Wider gaps’, where limited development may be possible without coalescence between settlements.
- ‘Less essential gaps’, where development is likely to be possible without any risk of coalescence between settlements.

Purpose 2 Assessment Criterion

Purpose	Criterion	Scores
To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.	<p>5: An ‘essential gap’ between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them.</p> <p>3: A ‘wider gap’ between non-Green Belt settlements where there may be scope for some development, but where the overall openness and the scale of the gap is important to restricting merging or protecting other gaps involving Green Belt settlements.</p> <p>1: A ‘less essential gap’ between non-Green Belt settlements, which is of sufficient scale and character that development is unlikely to cause merging between settlements or affect gaps between Green Belt and non-Green Belt settlements.</p> <p>0: Land parcel does not provide a gap between any settlements and makes no discernable contribution to separation.</p>
Total score		xx/5

Purpose 3 Assessment

Purpose 3: To assist in safeguarding the countryside from encroachment

- 4.4.21** This purpose seeks to safeguard the countryside. The assessment considered openness and the extent to which the Green Belt can be characterised as ‘countryside’, thus resisting encroachment from past development. Openness refers to the extent to which Green Belt land could be considered open from an absence of built development rather than from a landscape character perspective, where openness might be characterised through topography and presence or otherwise of woodland and hedgerow cover.
- 4.4.22** Historic open land uses associated with the urban fringe and urban characteristics as well as the countryside exist in the Buckinghamshire Green Belt and include, but are not limited to, mineral working and landfill, public utilities, motorways and their intersections, educational institutions, hotels and some small areas of residential development. Some of these semi-urban uses will have an impact on the ‘openness’ of the Green Belt as identified in the assessment.

Purpose 3 Assessment Criterion

- 4.4.23** The criterion used to assess the General Areas against Purpose 3 is set out below. Ordnance Survey base maps and aerial photography were reviewed in order to undertake the openness assessment.
- 4.4.24** The percentage of built form within a General Area was calculated using GIS tools based on the land area of features that are classified as manmade (constructed) within the Ordnance Survey MasterMap data, excluding roads and railway lines. The data includes buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures.
- 4.4.25** The score attributed to a General Area was initially determined on the basis of the percentage of built form. Scores were considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate.³⁰ This assessment considered, in particular, the extent to which General Areas might be reasonably identified as ‘countryside’ (in line with the NPPF). In order to differentiate between different areas, broad categorisation was developed encompassing assessments of land use (including agricultural use), morphology, context, scale and links to the wider Green Belt:
- ‘Strong unspoilt rural character’ was defined as land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland / scrubland and open fields.

³⁰ For example, General Areas with a relatively low level of built form (e.g. less than 10%) and a largely rural character would score 3; however a General Area with a relatively low level of built form (e.g. less than 10%) but with an urban character (such as formal open space designation covering the entire General Area) would score 1.

- ‘Largely rural open character’ was defined as land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.
- ‘Semi-urban character’ was defined as land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
- ‘Urban character’ was defined as land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

Purpose 3 Assessment Criterion

Purpose	Criterion	Score
Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	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 semi-urban 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.
Total score		xx/5

Purpose 4 Assessment

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

- 4.4.26** This purpose serves to protect the setting of historic settlements by retaining the surrounding open land or by retaining the landscape context for historic centres. As outlined in the advice note published

by PAS³¹, the assessment of this purpose relates to very few settlements in practice, due largely to the pattern of modern development that often envelopes historic towns today. Cambridge is a good example of a settlement where the setting of the historic centre is contextualised by rural features, where the views across the ‘backs’ retain a special status in planning terms. While individual historic assets are afforded protection through other legislative measures, there are examples of major settlements in Buckinghamshire and in neighbouring authority areas whose historic cores, as a whole, have not been completely enveloped by modern development, and where the countryside makes a strong contribution to the historic setting of the place.

- 4.4.27** In developing the methodology for this purpose, it was noted that a high level Green Belt Assessment prepared by Oxford City Council used landscape character assessment as a key source for identifying traits of the surrounding countryside which contributed to the city’s special character and historic setting.³² Indeed, landscape character is frequently utilised as a tool to enrich Green Belt assessments. This Study has utilised the Buckinghamshire Authorities’ Historic Towns Project assessment, supplemented as required by additional evidence such as Conservation Area Assessments and Townscape Character Studies, and also consulted directly with the Steering Group officers to identify areas of non-Green Belt settlements where the historic core directly abuts the Green Belt (Table 4.3, Map 4.6).³³ General Areas directly adjoining these historic cores were then subject to further assessment for Purpose 4, for which two aspects were of particular importance:
- The role of the General Area in providing immediate context for the historic settlement (along the boundary between the settlement and the Green Belt); and
 - Contribution to views or vistas between the historic settlement and the surrounding countryside, looking both inwards and outwards where public viewpoints exist.

Table 4.3: Historic Settlement Cores Considered in Purpose 4 Assessment

Buckinghamshire	Neighbouring Local Authorities
Amersham	Eton (RB Windsor and Maidenhead)
Beaconsfield	Windsor (RB Windsor and Maidenhead)
Chalfont St Giles	
Chalfont St Peter	
Chesham	
Great Missenden	
Ivinghoe	
Marlow	

³¹ Planning on the Doorstep: The Big Issues – Green Belt, PAS, 2014

³² Investigation into the potential to accommodate urban extensions in Oxford’s Green Belt: Informal Assessment, Oxford City Council, 2014

³³ From Markets to Metroland: The Buckinghamshire and Milton Keynes Historic Towns Project, Buckinghamshire Authorities and Milton Keynes Council, 2014

Buckinghamshire	Neighbouring Local Authorities
Wendover	

Purpose 4 Assessment Criterion

4.4.28 The relative importance of particular landforms or landscape features to the setting and special character of a historic town was adjudged using the Buckinghamshire Landscape Character Assessment, as well as Townscape Character Studies and Conservation Area Assessments (where applicable).³⁴ Potential vistas were identified using Ordnance Survey contour maps and sense checked on site visits.

Purpose 4 Assessment Criterion

Purpose	Criterion	Score
To preserve the setting and special character of historic towns	Protects land which provides immediate and wider context for a historic settlement, including views and vistas between the settlement and the surrounding countryside.	5: Land parcel plays an important role in maintaining the unique setting of a historic settlement by providing unspoilt vistas of surrounding countryside from within the settlement or unbroken vistas into the settlement from afar, and protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.
		3: Land parcel plays an important role in maintaining the unique setting of a historic settlement by providing unspoilt vistas of surrounding countryside from within the settlement or unbroken vistas into the settlement from afar, or protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.
		1: Land parcel makes limited contribution to the broader setting of a historic town by providing a countryside setting for a historic core which is inward facing, and has a weak relationship with the surrounding countryside.
		0: Land parcel does not abut an identified historic settlement core.
Total score		xx/5

³⁴ Buckinghamshire Landscape Character Assessment, Buckinghamshire County Council, 2011

Purpose 5 Assessment

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.4.29 Purpose 5 focuses on assisting urban regeneration through the recycling of derelict and other urban land. As outlined in Section 2, the advice note issued by PAS suggests that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against this purpose will not enable a distinction between General Areas as all Green Belt achieves the purpose to the same extent.

4.4.30 Furthermore, during engagement with the Steering Group, we discussed whether any planned urban regeneration schemes were being inhibited by Green Belt designations, but no areas were identified by the Steering Group or stakeholders.

4.4.31 As a result, Purpose 5 was excluded from the assessment.

Pro Forma

4.4.32 A pro-forma was prepared to capture the assessments against each criterion for the General Areas. A copy can be found in Appendix B.

4.4.33 Selected completed pro-formas were shared with neighbouring authorities outside of Buckinghamshire for comment during November and December 2015. Comments were taken into account when finalising the report, where appropriate.

Recommendations

4.4.34 At this stage, the criterion scores for Purposes 1-4 were collated and tabulated across all of the General Areas, to highlight those areas meeting the purposes to a lesser or greater extent.

4.4.35 Recommendations were set out following the ‘rule of thumb’ (set out in paragraphs 4.4.4 – 4.4.5), whereby weaker performing General Areas and smaller sub-areas were identified and listed with a view to possible further detailed assessment in Part 2.

- 2 General Areas at the edge of Leighton Linlade, directly abutting the western extremity of the Green Belt in Central Bedfordshire (109-110); and
- 4 General Areas at the edge of settlements in Wycombe district (former areas of safeguarded land, now reserve sites which have been released by the Council for development) (111-114).

5.2.2 All of these General Areas were found to meet Green Belt purposes to a greater or lesser extent.

5.2.3 If designated, 11 non-Green Belt General Areas would potentially prevent sprawl and meet Purpose 1, albeit two only weakly as a result of their containment within the footprint of the High Wycombe large built-up area (112 and 114).

5.2.4 All 14 non-Green Belt General Areas make some contribution to preventing the coalescence of settlements and thus would meet Purpose 2 if designated. In particular, the potential role of General Area 103 in preventing the coalescence of Princes Risborough / Monks Risborough and Longwick, as well as General Area 107 in restricting the merging of Wendover and Weston Turville, were noted. General Areas 109-112 and 114, in contrast, would only have scope to meet this purpose weakly.

5.2.5 All non-Green Belt General Areas meet Purpose 3, attaining a score of 3 or higher. Eight of the 14 General Areas (57%) have the potential to meet this purpose relatively strongly or strongly, scoring 4 or 5. This reflects the nature of many of the areas considered, several of which are covered by countryside designations in the relevant local development plans.

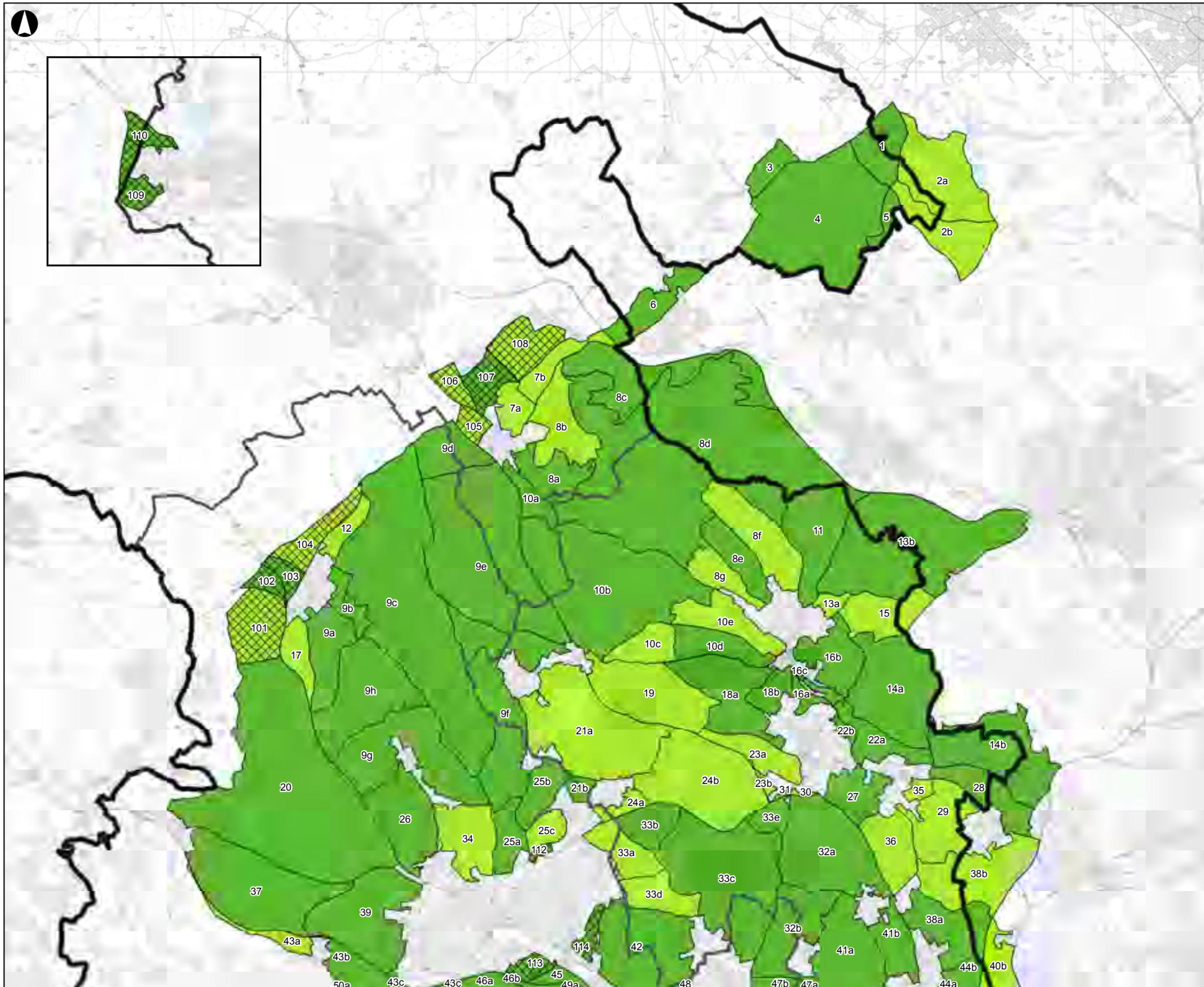
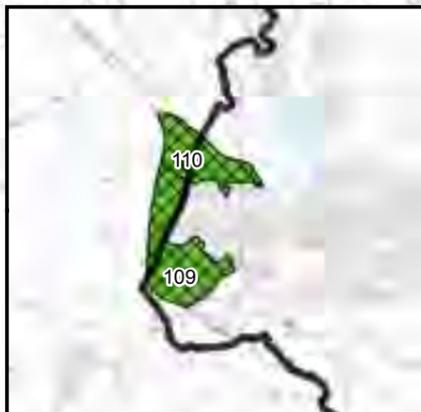
5.3 Overall Summary

5.3.1 All 171 General Areas (Green Belt and non-Green Belt) meet one or more of the NPPF purposes to varying degrees. The individual purpose scores for Green Belt General Areas are set out in Table 5.1, and non-Green Belt General Areas in Table 5.2, and illustrated graphically in Maps 5.1-5.4.

5.3.2 In order to summarise the outcomes from the assessment, the General Areas have been categorised as follows:

- 116 General Areas are judged to be strongly scoring Green Belt, meeting at least one of the purposes strongly (scoring 4 or 5);
- 53 General Areas are judged to be medium scoring Green Belt, scoring moderately (3) against at least one purpose and failing to score strongly against any purpose (4 or 5);
- 2 General Areas are judged to be weakly scoring Green Belt, failing to meet or weakly meeting all purposes (scoring 1 or 2).

5.3.3 The categorisation of General Areas is also set out in Table 5.1 and Table 5.2 and in Maps 5.5A and 5.5B.



Legend

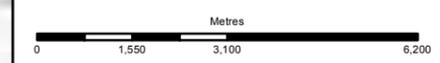
- Buckinghamshire County
- Buckinghamshire District

Overall

- Weak
- Medium
- Strong
- General Areas
- Non-Green Belt General Areas

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P1	21-01-16	CG	ML	AB
Issue	Date	By	Chkd	Appd



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Client
The Buckinghamshire Authorities

Job Title
Buckinghamshire Green Belt Assessment

Map 5.5a Overall Assessment Scores, North

Scale at A3
1:115,000

Job No 242368-00	Drawing Status Issue
Drawing No 5.5a	Issue P1

General Area	Local Authority	Area (ha)	Purpose Assessments					Overall Summary
			Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
			(a) Land parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	Protects lane which provides immediate and wider context for a historic settlement, including views and vistas between the settlement and the surrounding countryside	
35	Chiltern	48.9	FAIL	0	1	3	0	Medium
36	Chiltern	308.0	FAIL	0	3	3	0	Medium
37	Wycombe	905.1	FAIL	0	3	5	0	Strong
38a	Chiltern / Three Rivers	399.3	PASS	3+	5	3	0	Strong
38b	Chiltern / Three Rivers	556.1	PASS	3	3	3	0	Medium
39	Wycombe	696.0	PASS	3+	3	5	0	Strong
40a	South Bucks	91.7	FAIL	0	3	4	0	Strong
40b	Chiltern / South Bucks / Three Rivers	619.7	FAIL	0	3	3	0	Medium
41a	Chiltern	699.5	PASS	3+	5	3	0	Strong
41b	Chiltern	230.6	PASS	3+	5	3	3	Strong
42	Chiltern / Wycombe	729.4	PASS	3+	3	3	0	Strong
43a	Wycombe	91.1	FAIL	0	3	3	0	Medium

6 Recommendations

6.1 Summary

6.1.1 Following the assessments of the General Areas against the NPPF purposes, a series of recommendations have been identified which the Buckinghamshire Authorities may wish to take forward in Part 2, including consideration of whether ‘exceptional circumstances’ exist to justify any alterations to the Green Belt boundary.

6.1.2 While it is clear that the majority of the Buckinghamshire Green Belt is performing an important role in terms of the NPPF purposes, a number of more weakly performing areas have been identified which may warrant further consideration. The areas for further consideration can broadly be categorised as follows:

1. General Areas which score weakly overall against the NPPF purposes (e.g. attain low scores across all criteria) and could be considered further by the respective Councils as part of their Part 2 work.
2. Whole General Areas or clusters of General Areas which, although medium or strongly scoring against the NPPF purposes, have particular characteristics or synergies with neighbouring weaker General Areas, which might lend themselves to further consideration in Part 2. These specific characteristics are set out clearly for each recommended area.
3. 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.
4. Non-Green Belt General Areas which could be considered for inclusion in the Green Belt. This would also have to include the consideration of whether ‘exceptional circumstances’ exist to justify any alterations to the Green Belt boundary. In accordance with the NPPF, this would apply equally to any additions to the Green Belt as it would to any subtractions.

6.1.3 All Recommended Areas have been assigned a new ID number, dependant on whether whole General Areas or sub-areas have been identified.³⁶ A summary of all areas recommended for further consideration, including cross-references between original General Areas IDs and Recommended Area IDs, is provided in Table 6.1.

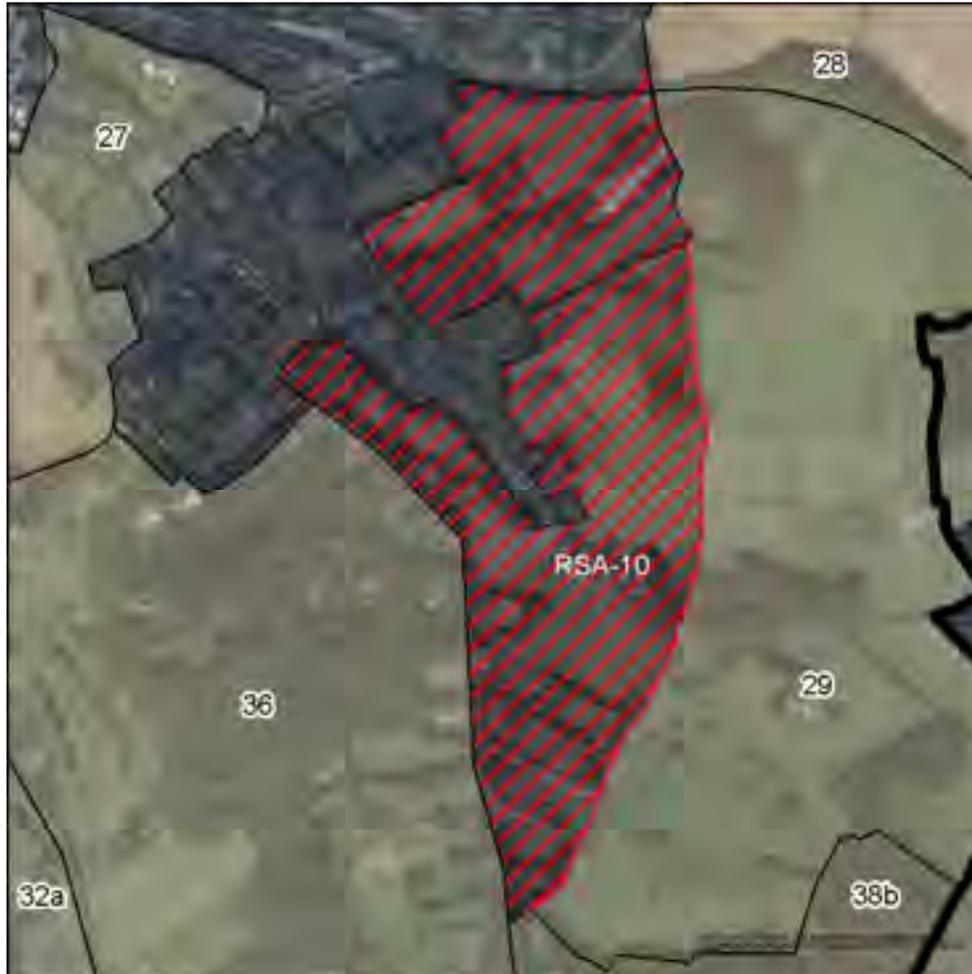
³⁶ RGA for whole General Areas recommended for further consideration, RSA for recommended sub-areas.

6.1.4 Recommendations in categories 1-3 are illustrated spatially for the whole of Buckinghamshire in Maps 6.1a and 6.1b, with more detailed maps provided for individual recommendations in Sections 6.2 – 6.4.

Table 6.1: Summary of Recommended Areas

General Area ID(s)	Recommendation Category	Recommended Area ID	Local Authority
80a	1	RGA-1	South Bucks
92	1	RGA-2	South Bucks
13a	2	RGA-3	Chiltern
30	2	RGA-4	Chiltern
31	2	RGA-5	Chiltern
57a	2	RGA-6	Chiltern / South Bucks
65a	2	RGA-7	South Bucks
84 & 89	2	RGA-8	South Bucks
2a	3	RSA-1	Aylesbury Vale / <i>Central Bedfordshire</i>
7a	3	RSA-2	Aylesbury Vale
8b	3	RSA-3	Aylesbury Vale
9a	3	RSA-4	Wycombe
9g	3	RSA-5	Wycombe
15	3	RSA-6	Chiltern
22a	3	RSA-7	Chiltern
23a	3	RSA-8	Chiltern
24a	3	RSA-9	Chiltern / Wycombe
29 & 35	3	RSA-10	Chiltern
32a	3	RSA-11	Chiltern
38a	3	RSA-12	Chiltern
40b	3	RSA-13	South Bucks
43b	3	RSA-14	Wycombe
44a	3	RSA-15	Chiltern
47a	3	RSA-16	South Bucks
47b	3	RSA-17	South Bucks
53b	3	RSA-18	South Bucks
58a	3	RSA-19 & RSA-20	Wycombe
60 & 67	3	RSA-21	Wycombe
66	3	RSA-22	South Bucks
74	3	RSA-23 & RSA-24	South Bucks
76 & 85b	3	RSA-25	South Bucks
76 & 80b	3	RSA-26	South Bucks
80b	3	RSA-27	South Bucks

RSA-10 (General Areas 29 and 35 – East of Little Chalfont)



- 6.4.21** As a whole, General Areas 29 and 35, located to the south-east of Little Chalfont, achieve medium scores against the NPPF purposes. While they meet neither Purpose 1 nor Purpose 4, they prevent development in areas of open land which retain a largely rural character, thus restricting encroachment (Purpose 3). While General Area 35 makes only a minor contribution to preventing coalescence of settlements, General Area 29 maintains the scale of the gaps between Little Chalfont and Chalfont St Giles to the south, as well as Chorleywood to the east in the neighbouring district of Three Rivers.
- 6.4.22** The identified sub-area RSA-10, which encompasses the western parts of General Areas 29 and 35, was noted during the assessment as being less integral to the wider Green Belt. General Area 35 is surrounded on three sides by built-form and is characterised by enclosed spaces, paddocks and a former golf course which diminish its rurality and its relationship with the wider countryside. Immediately to the south, the identified part of General Area 29 (west of Lodge Lane / Roughwood Lane) has a fragmented sense of openness, frequently punctuated by dispersed residential developments and often enclosed by ribbon development, weakening its relationship with the wider countryside.

6.4.23 While there is scope for general further consideration of this broad area collectively, this should take into account the need to maintain a strong area of separation between Little Chalfont and Chalfont St Giles.

Recommendation: General Areas 29 and 35 meet the NPPF purposes, but there is scope to collectively consider an identified broad area further, bounded by Lodge Lane, Roughwood Lane and the B442 (Nightingales Lane) and collectively identified as RSA-10; this area may score weakly and could be considered further.

RSA-11 (General Area 32a – North of Chalfont St Giles)



6.4.24 As a whole, General Area 32a, located between Chalfont St Giles and Amersham, is identified as strongly performing Green Belt, particularly with respect to its prevention of encroachment into the countryside (Purpose 3). It protects open land which has a strong, unspoilt rural character, predominantly characterised by open agricultural fields and clusters of woodland. The northern part of the General Area prevents the outward sprawl of the large built-up area of Amersham into open land (Purpose 1), and maintains the scale of the gap between Amersham and Little Chalfont and Chalfont St Giles (Purpose 2). It also maintains the unique setting of two historic

General Area	35		
Area (ha)	48.9		
Local Authority	Chiltern		
Location Plan			
Description	General Area 35 is located to the south-east of Little Chalfont and is bordered by this settlement to the north and west, Long Walk to the south and Lodge Lane to the east.		
Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas.	The land parcel is not at the edge of a distinct large built-up area.	FAIL
	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.		0
Purpose 1: Total Score			0/5
(2) To prevent neighbouring towns from	Prevents development that would result in merging of or significant	The land parcel forms a small part of the wider gap between the non-Green Belt settlements of Little Chalfont and Chorleywood. Although the scale of the land parcel	1

merging	erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.	contributes to this gap, development in the land parcel is unlikely to cause merging between settlements.	
Purpose 2: Total Score			1/5
(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	<p>Less than 5% of the land parcel is covered by built form.</p> <p>The land parcel is characterised by enclosed paddocks and fields in the south of the land parcel and the former Little Chalfont Golf Club in the north of the land parcel, interspersed with concentrated woodland areas. There are limited views out to the surrounding countryside from public areas in the land parcel and the parcel has a weak relationship with the wider countryside owing to the presence of built-form on the southern boundary. Built-form includes a large vehicle maintenance depot in the east of the land parcel, buildings associated with the golf club and a large detached property in the west of the land parcel. The presence of built-form and enclosed character of the land parcel means that it has only a largely rural character.</p>	3
Purpose 3: Total Score			3/5
(4) To preserved the setting and special character of historic towns	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside.	The land parcel does not abut an identified historic settlement core and does not meet this Purpose.	0
Purpose 4: Total Score			0/5

Site Photos



Photograph 1: View of paddocks and trees behind in General Area 35 facing north from Long Walk, which is characteristic of the south of the land parcel.



Photograph 2: View of properties abutting the southern boundary of General Area 35, facing west.

1:20000
Context Plan



Appendix 12 Extracts from Green Belt Assessment Part Two Reports

Chiltern District Council and South Bucks District Council

Green Belt Assessment Part Two Update April 2019

*This update supersedes the earlier Draft
Part Two Green Belt Assessment*



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1. Introduction

Background

- 1.1 Chiltern District Council and South Bucks District Council are preparing a new joint Local Plan. The new Local Plan will replace the Chiltern Core Strategy (adopted November 2011) and the South Bucks Core Strategy (adopted February 2011) and the Saved Policies in the Chiltern Local Plan (adopted 1997) and South Bucks Local Plan (adopted 1999). The Green Belt Assessment Part Two forms part of the evidence base for the Local Plan and has been taken into account alongside other evidence in making decisions about possible changes to Green Belt boundaries. The current extent of the Green Belt in Chiltern and South Bucks Districts is shown in Figure 1.

Figure 1: Green Belt in Chiltern and South Bucks Districts



- 1.2 The starting point for the Part Two Assessment is the Buckinghamshire Green Belt Assessment Part One. The Part One Assessment was carried out by Arup on behalf of the Buckinghamshire authorities (Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Wycombe District Council and Buckinghamshire County Council) to inform Local Plan preparation across the County. Part One was published in March 2016^{1,2}.
- 1.3 As set out in the Part One report, the Green Belt Assessment was to be undertaken in two phases. Part One was to assess, for the whole of the Green Belt in Buckinghamshire, the relative performance of strategic land parcels, termed 'General Areas', against the purposes of the Green Belt as defined in the then National Planning Policy Framework³ (NPPF 2012). In Part Two, the local planning authorities would consider the Part One findings in more detail to inform consideration of whether exceptional circumstances exist that would justify adjustments to Green Belt boundaries through the updating of their local plans. The matter of existing boundaries between the Green Belt and settlements within the two Districts is the subject of a separate detailed, comprehensive and consistent review⁴.
- 1.4 This update supersedes the earlier Draft Part Two Green Belt Assessment for Chiltern and South Bucks Districts published in October 2016.

Green Belt Assessment Part One Conclusions

- 1.5 The Arup report for the Buckinghamshire Councils concludes that *'The Green Belt in Buckinghamshire has, since its original designation, played a crucial role in: preventing the outward sprawl of Greater London, as well as other large built-up areas throughout Buckinghamshire; maintaining the county's settlement pattern; ensuring the continued openness of the countryside; and protecting the unique rural context of the county's historic towns. It is striking that, many years after its original designation, the Green Belt continues to perform these roles so strongly.'*
- 1.6 Whilst the Part One report found that every General Area met the NPPF purposes⁵ to some extent, and the majority of the Buckinghamshire Green Belt performs an important role in terms of the NPPF purposes, there are a number of areas that perform more weakly and which warrant further consideration. Arup categorised these areas as follows⁶:
- General Areas which score weakly overall against the NPPF purposes;
 - Whole General Areas or clusters of General Areas which, although medium or strongly scoring against the NPPF purposes, have particular characteristics or synergies with neighbouring weaker General Areas;
 - 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.

¹ Buckinghamshire Green Belt Assessment, Methodology and Assessment of General Areas, Arup for the Buckinghamshire Authorities, March 2016.

² Referred to in this Part Two Update report as 'the Arup report' or the 'Part One report/study'.

³ National Planning Policy Framework, Department for Communities and Local Government, March 2012.

⁴ Green Belt Exceptional Circumstances Report- April 2019

⁵ The five purposes for the Green Belt set out in the NPPF 2012 are unchanged in the NPPF 2019.

⁶ Arup also identified a category comprising non-Green Belt General Areas which could be considered for inclusion in the Green Belt. None of the areas in this category are within Chiltern or South Bucks Districts.

1.7 The Part One report identifies 8 'Recommended General Areas', all of which are in Chiltern and/or South Bucks Districts. The Part One report also identified 31 'Recommended Sub Areas' of which 22 are in Chiltern and/or South Bucks Districts⁷. The Part One report explains that the areas tend to be concentrated in the south and east of Buckinghamshire as a result of settlement growth and piecemeal development in rural areas which has fragmented the countryside, creating small, isolated areas of Green Belt which tend to make little contribution to the integrity of the wider Metropolitan Green Belt and contribute weakly to NPPF purposes. There are also areas of land which have suffered more substantial encroachment, harming the overall integrity of the Green Belt.

Purpose and Objectives of the Part Two Assessment

1.8 The purpose of Part One of the Green Belt Assessment was to provide evidence of how different areas perform against the Green Belt purposes set out in national policy. The overall purpose of Part Two is to consider through more detailed assessment the appropriateness of any adjustments to Green Belt boundaries in respect of the Part One Recommended General Areas and Recommended Sub Areas in Chiltern and South Bucks Districts.

1.9 Together with separate emerging Local Plan evidence around the relative suitability of different Green Belt sites for development⁸, the Part Two assessment feeds into the assessment of whether, in accordance with the NPPF, there may be exceptional circumstances that would justify the alteration of the Green Belt boundary through the new Local Plan for Chiltern and South Bucks Districts.

1.10 The more specific objectives of the Part Two Green Belt Assessment Part Two are as follows:

- (i) For each of the Part One recommended areas, to evaluate and score them against the NPPF Green Belt purposes and present clear and fully justified conclusions on their performance⁹.
- (ii) For each of the Part One recommended areas, to consider whether releasing the land from the Green Belt would result in harm in terms of wider Green Belt objectives and/or conflict with the wider strategic function of the Green Belt in the form of cumulative impacts.
- (iii) For each of the Part One recommended areas, to consider whether it would be possible to define a revised Green Belt boundary that is permanent and defensible in accordance with NPPF requirements and present this on Ordnance Survey base maps.
- (iv) For each of the Part One recommended areas, where it is not possible to identify a revised Green Belt boundary in accordance with NPPF requirements, to provide a reasoned explanation as to why this cannot be secured.

National Planning Policy for Green Belt

1.11 In February 2017 the Government published its Housing White Paper, 'Fixing Our Broken Housing Market'. The White Paper set out how the Government intends to boost housing

⁷ See Table 6.1, Map 6.1a, Map 6.1b and Sections 6.2 – 6.4 of the Arup Green Belt Assessment Report for the Buckinghamshire Councils.

⁸ Including Green Belt Development Options Appraisals October 2016 and November 2017. The Green Belt Development Options Appraisal extends to a broader range of factors and considerations, both site-based and more strategic.

⁹ This does not apply to Registered General Areas identified by Arup which were scored in Part One.

supply and, over the long term, create a more efficient housing market. Overall, the White Paper did not propose any fundamental change to the concept of Green Belt, stressing the Government's commitment to maintaining its strong protections.

- 1.12 However, the White Paper did propose changes to the 2012 NPPF, to stress that Green Belt boundaries should only be amended when all other reasonable options have been examined fully by local authorities. The White Paper also suggested that, when Green Belt boundaries are reviewed, local authorities should look first towards releasing previously developed land or areas surrounding transport hubs ahead of other Green Belt. Additionally, the White Paper proposed that there would be a re-framing of national policy to highlight the need for compensatory local plan policies to offset the impact of releasing areas of Green Belt. This might, for example, include compensatory improvements to environmental quality or accessibility.
- 1.13 Following public consultation on the Housing White Paper during spring 2017, the Government published for consultation a draft revised NPPF. The final version of the revised NPPF was published in July 2018, with minor revisions published in February 2019, replacing the first NPPF published in 2012.
- 1.14 The revised NPPF re-states without change the five Green Belt purposes, maintains the strong protections of the Green Belt and retains a high bar before land may be released from the Green Belt. Plans should positively seek opportunities to meet the development needs of their area and, as a minimum provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless the application of NPPF policies that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution in the plan area. The policies referred to include Green Belt (NPPF, para. 11 and footnote 6).
- 1.15 The NPPF confirms that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and degree of permanence. Para.134 of the NPPF confirms that the five purposes of Green Belts are:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF also states (at para. 136) that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans, and that in establishing the need for any changes to Green Belt boundaries strategic policies should have regard to their intended permanence in the long-term, so that they can endure beyond the plan period. When drawing up or reviewing Green Belt boundaries the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport (NPPF para. 138). The approach that local

planning authorities should take when defining Green Belt boundaries is set out in para. 139 of the NPPF.

Report Structure

1.16 The remainder of this report is structured as follows:

- **Section 2** explains the scope of the Part Two Green Belt Assessment for Chiltern and South Bucks Districts.
- **Section 3** explains the methodology that has been used in Part Two, including the way in which it has evolved since the October 2016 report on the Draft Part Two Assessment.
- **Section 4** sets out the key findings.

1.17 This Part Two report should be read in conjunction with the Buckinghamshire Green Belt Assessment (the Part One study by Arup for the Buckinghamshire Councils).

Status of this Report

1.18 The methodology in this Part Two report and the Part Two Green Belt Assessment Update have been published alongside the Chiltern and South Bucks District Councils' Draft Local Plan. This Part Two Update report has been finalised having taken into account comments submitted in response to the public consultation on the Green Belt Preferred Options. (**Appendix 2** to this report summarises the consultation responses relating to the Draft Part Two methodology and its application and the way in which the responses have been taken into account). A more detailed explanation of the evolution of the methodology is provided in **Section 3** of this report.

2. Scope of the Green Belt Assessment Part Two

- 2.1 The Arup Part One Assessment includes a series of recommendations for further consideration through the local plan process, including whether there might be the potential for the demonstration of 'exceptional circumstances' to justify any alteration to the Green Belt boundary. They are the areas of Green Belt which the Part One assessment concluded were the more weakly performing in terms of the NPPF purposes. All of the areas identified by Arup in Chiltern and South Bucks Districts have been taken forward in Part Two.
- 2.2 The scope of Part Two comprises a total of 30 areas of land compiled from the following sources:
- Arup Part One Assessment Recommended General Areas
 - Arup Part One Assessment Recommended Sub Areas.
- 2.3 The areas of land are listed in [Table 1](#).

Table 1: Green Belt Assessment Part Two Update - List of Areas Considered

Part Two Ref No	Site Description	District	Part One Recommended Area ID
1.01	North East of Chesham (Lye Green Road Area)	Chiltern	RGA-3
1.02	Botley	Chiltern	RSA-6
1.03	Area South of Holmer Green (Skimmers Orchard)	Chiltern	RSA-9
1.04	Area North of High Street, Amersham Old Town	Chiltern	RSA-8
1.05	Area South of Amersham (Land at Crown Farm)	Chiltern	RGA-5
1.06	Area South of Amersham (Between the A413 and A355)	Chiltern	RGA-4
1.07	Area North of Little Chalfont (Including Stony Lane)	Chiltern	RSA-7
1.08	Area South of Little Chalfont (Lodge Lane and Burtons Lane)	Chiltern	RSA-10
1.09	Area North East of Chalfont St Giles	Chiltern	RSA-11
1.10	Area North of Chalfont St Peter (Epilepsy Centre Site)	Chiltern	RSA-12
1.11	Area South East of Chalfont St Peter (Winkers)	Chiltern	RSA-15
1.12	Land West of the A413, Chalfont St Peter and Gerrards Cross	Chiltern	RGA-6
1.13	Area East of Beaconsfield along A355	South Bucks	RSA-17
1.14	Area East of Beaconsfield (Including Wilton Park)	South Bucks	RSA-16
1.15	Land East of Beaconsfield South of Pyebush Roundabout	South Bucks	RSA-18
1.16	Area West of Denham Green (Near Denham Golf Club)	South Bucks	RSA-13
1.17	Area within Tatling End (Along the A40)	South Bucks	RGA-7
1.18	Denham	South Bucks	RSA-22
1.19	Land North of Iver Heath (including Pinewood Studios)	South Bucks	RSA-23
1.20	Area West of Iver Heath (NE of Five Points Roundabout)	South Bucks	RSA-24
1.21	Area West of Iver Heath (SE of Five Points Roundabout)	South Bucks	RSA-29
1.22	South East of Iver Heath (along Bangor's Road)	South Bucks	RSA-28
1.23	Taplow Riverside Area	South Bucks	RGA-8
1.24	Area South of Burnham (Burnham Park)	South Bucks	RGA-1
1.25	Land West of Farnham Royal (Along Crown Lane)	South Bucks	RSA-27
1.26	Area East of Farnham Royal (Along Beaconsfield Road)	South Bucks	RSA-26
1.27	Stoke Park Area, Stoke Poges	South Bucks	RSA-25
1.28	Area South of Iver	South Bucks	RSA-30
1.29	Area South East of Iver (West of the M25)	South Bucks	RGA-2
1.30	Area South of Richings Park (Along Richings Way)	South Bucks	RSA-31

3. Methodology

Evolution of the Methodology

- 3.1 This methodology has been developed specifically for the Chiltern and South Bucks Green Belt Assessment Part Two.
- 3.2 The methodology took as its starting point the draft methodology for Buckinghamshire published by Aylesbury Vale District Council and Wycombe District Council in July 2016. Aylesbury Vale District Council and Wycombe District Council undertook their Part Two Green Belt Assessments in advance of Chiltern and South Bucks in accordance with their July 2016 methodology. Chiltern and South Bucks Councils produced their own methodology which was used to complete the Draft Green Belt Assessment Part Two. This was published alongside the Green Belt Preferred Options Consultation in October 2016. Comments were invited on the methodology used for the Draft Part Two Assessment as well as on the Assessment itself.
- 3.3 The methodology presented here has undergone further amendments, taking into account the outcomes of the Green Belt Preferred Options Consultation and further evolution of the Local Plan and wider evidence. In particular:
- The entirety of the Green Belt in South Bucks and Chiltern was assessed against the NPPF purposes through the Part One Green Belt Assessment. The scope of the Green Belt Assessment Part Two is limited to the 30 areas that the Green Belt Assessment Part One concluded perform more weakly in Green Belt terms and which therefore warrant further, more detailed consideration.
 - The Green Belt Part Two Assessment no longer includes a detailed assessment of Green Belt areas against a wider range of considerations linked to sustainable development, including consideration of alignment with the Local Plan objectives. That analysis now forms part of the Green Belt Options Appraisal.
 - It is recognised that the performance of Green Belt areas in the context of national Green Belt policy is only one aspect of a much broader consideration of potential exceptional circumstances for amending Green Belt boundaries. Given the re-focusing of the Green Belt Assessment Part Two and the inclusion of broader assessment work into the Green Belt Development Options Appraisal, consideration of potential exceptional circumstances now sits outside the scope of the Green Belt Assessment Part Two Update¹⁰.

Part One Recommended Areas Not Assessed Further in Part Two

- 3.4 It is important that the local plan process deals with any Green Belt boundary anomalies and considers whether there is a need to create new boundaries that will endure for the long-term as a result of, for example, the comprehensive redevelopment of Major Developed Sites in the Green Belt in accordance with existing local plan policies. As set out in the Green Belt Assessment Part One Conclusions, Part One identified 8 'Recommended General Areas' and 22 'Recommended Sub Areas' across Chiltern South Bucks Districts. The majority of these areas are considered further in the Green Belt Assessment Part Two Update. However, it is judged that for a limited number of areas, the Part One Assessment provides sufficient information

¹⁰ Green Belt Exceptional Circumstances Report

on performance against Green Belt purposes and new permanent and defensible Green Belt boundaries such that it is unnecessary to consider these further in the Part Two Update. These are all areas that do not, in effect, function as part of the Green Belt, in that they do not reflect the 'essential characteristics' of the Green Belt (NPPF, para. 133). More specifically, they comprise either: (i) part of an existing built-up area; (ii) public open space within an urban context; or (iii) areas where substantial built development has been approved in accordance with the NPPF because there were 'very special circumstances' to do so. In each case there is no or very limited potential for further development and the potential for defensible, recognisable boundaries has been identified in the Part One Assessment.

3.5 The areas not considered further in the Green Belt Assessment Part Two Update are:

- Denham – A Green Belt settlement described in the Part One Assessment as quite densely built-up with an inherently semi-urban character. (Part One RSA-22)
- Land north of Iver including Pinewood Studios – The land with planning permission for expansion of Pinewood Studios. Development is under construction. (Part One RSA-23)
- Taplow Riverside Area – The Green Belt settlement of Taplow Riverside which has a high proportion of built form and the Mill Lane Major Developed Site in the Green Belt which has planning permission for demolition of existing buildings and structures and construction of 141 dwellings, 40 senior living apartments etc. Development is under construction. (Part One RGA-8)
- Burnham – An urban park. (Part One RGA-1)

3.6 Because the NPPF states that Green Belt boundaries can only be altered where exceptional circumstances are fully justified through the preparation or updating of plans, relevant evidence relating to the areas listed above in [para. 3.5](#) forms part of the consideration of potential exceptional circumstances.

Inner Green Belt Boundary Review

3.7 To inform the Chiltern and South Bucks Local Plan, a separate detailed, comprehensive and consistent review has been undertaken of the existing boundaries between the Green Belt and settlements within the two Districts. The purpose of that review is to consider whether, in the light of detailed boundary issues, there are exceptional circumstances to change the Green Belt boundary, and if necessary, recommend minor changes to the boundary line in order to remove any anomalies and ensure that the Green Belt boundary is strong, permanent, defensible and will endure beyond the plan period. The Inner Green Belt Boundary Review does not seek to recommend releasing land of a strategic nature from the Green Belt but may result in small scale additions to and/or deletions from the Green Belt.

Green Belt Part Two Update Assessment Process

- 3.8 The Part Two Assessment considers each of the 30 areas that the Part One Assessment recommended for further consideration, with the exception of the 4 areas identified in [para. 3.5](#) of this report for which Part One provides sufficient information on performance against Green Belt purposes and new permanent and defensible Green Belt boundaries such that further consideration is not necessary. For the remaining 26 Part One recommended areas, there are four elements to the assessment – summarised in the following diagram ([Figure 2](#)). None of these stages operates as a filter: all of the areas considered are assessed in terms of Green Belt purposes, the strategic role of the Green Belt/wider Green Belt objectives and in terms of Green Belt boundaries.



1: Green Belt Purpose Assessment

- 3.9 A key consideration in determining whether exceptional circumstances exist to justify an alteration to a Green Belt boundary is the extent to which the Green Belt fulfils one or more of the five purposes of the Green Belt set out in national policy. The whole of the Green Belt in Chiltern and South Bucks Districts was scored against the NPPF purposes in the Green Belt Assessment Part One. This was on the basis of Green Belt General Areas, with the whole of the Buckinghamshire Green Belt being divided into a number of General Areas and each General Area being scored using a consistent methodology. The Part Two Assessment has (with the exception of the Part One RGAs – see [Table 1](#)) considered areas of land smaller than the General Areas identified in Part One – the 22 Recommended Sub Areas identified by Arup for further, more detailed consideration. It was therefore necessary to consider whether the purpose scores for the whole of a General Area from Part One should be adjusted for any sub-area being considered in Part Two. This was because a sub-area might score differently when assessed in isolation from the rest of the General Area in which it is located. There was no scope to review the Part One assessment for the whole of the General Area; the purpose of the scoring review was to consider any differentiation in terms of how the sub-area recommended in Part One for further consideration functions and fulfils the purposes of the Green Belt.

3.10 The Part One Assessment methodology used one or more criteria to assess the performance of a General Area against each Green Belt purpose. Qualitative and quantitative measures were used and scores were attributed for each criterion, where 1 equalled 'criterion least fulfilled' and 5 equals 'criterion most fulfilled'. If a General Area was considered to have no contribution to a specific purpose, a score of zero was attributed. No weighting or aggregation of scores across the purposes was undertaken. Any General Area scoring strongly (4 or 5) against the criteria for one or more purpose was judged to be meeting the purposes strongly overall; a General Area fulfilling the criteria to a lesser extent (scores of 2 or below) across all purposes was deemed to be weaker Green Belt. A score of 3 was judged as meeting the Green Belt purpose when judged against that particular criterion. The approach used is summarised in this table taken from the Part One report.

Table 2: Green Belt Assessment Part Two Update - Criterion Scoring

Overall Strength of Area Against Criterion	Score	Equivalent Wording
	0	Does Not Meet Purpose
	1	Meets Purpose Weakly
	2	Meets Purpose Relatively Weakly
	3	Meets Purpose
	4	Meets Purpose Relatively Strongly
	5	Meets Purpose Strongly

3.11 To ensure continuity with the Part One Assessment, the same approach has been adopted in the Part Two Update, assessing each area of the Part One Recommended Areas (within the exception of the four areas listed in [para. 3.5](#) of this report) against the NPPF purposes using the same criteria and scoring scale – see Section 4.4 of the Part One report (pages 49 – 66) for more detail of the assessment criteria used for each of the Green Belt purposes. Note that the Part Two term 'Meets Purpose Moderately' equates to the terms 'medium' and 'Meets Purpose' used in the Part One Assessment.

2: Assessment of Wider Green Belt Objectives and Cumulative Impacts

3.12 Reflecting the need to consider the performance of Green Belt areas at both the 'micro' (area-specific) and macro (strategic) scales, based on a broader range of factors, this element of the assessment encompassed a wider consideration of potential harm to the Green Belt in terms of the broader purpose of the wider Green Belt (as set out in paragraph 141 of the NPPF) and the potential conflict with the wider strategic function of the Green Belt in the form of cumulative impacts and, drawing on evidence from the Part One Assessment.

3.13 An important aspect of the overall assessment process is its iterative nature and the need to understand the wider strategic context. This part of the assessment therefore considers the effects of potential Green Belt amendments on a cumulative basis, checking the findings for individual areas against assessment conclusions for other areas of Green Belt and considering

whether the scoring or the emerging conclusions in one area would affect conclusions in surrounding areas.

3: Assessment of Potential Green Belt Boundaries

- 3.14 Any potential alteration to the Green Belt must be based on a new permanent and defensible boundary that is capable of enduring beyond the plan period. All of those locations falling within the scope of this Part Two Update were considered further in terms of national planning policy on defining Green Belt boundaries as set out in the NPPF.
- 3.15 The Part One Assessment used the following boundary features as the initial basis for the identification of the General Areas (or parcels):
- Motorways
 - A & B roads
 - Railway lines
 - Rivers.
- 3.16 Given the diversity of local context in terms of urban and rural character across Buckinghamshire, the Part One Assessment also used the following additional durable boundary features, particularly in and around the non-Green Belt settlements:
- Unclassified public roads and private roads
 - Smaller water features, including streams, canals and other water courses
 - Prominent physical features (e.g. ridgelines)
 - Existing development with strongly established, regular or consistent boundaries
 - Protected woodland or hedgerows.
- 3.17 The same principles have underpinned the approach adopted in the Part Two Assessment Update. However, reflecting both the higher degree of granularity in this Assessment, as well as the role of this work in informing the emerging site-scale Local Plan policies, a greater degree of flexibility was applied in identifying the existence of, or potential for, boundaries that are consistent with the principles set out in the NPPF. This has included consideration of additional, smaller-scale boundary features where these form only a part of the overall boundary of the Green Belt area.
- 3.18 The approach used is summarised in **Table 3**. The boundaries assessed as 'likely to be weaker' or those entirely undefined on the ground would likely be considered unacceptable in NPPF terms and would therefore require strengthening, to be secured through the Local Plan.

Potential Boundary	Examples of Potential Boundary Features¹¹
Strongest	<ul style="list-style-type: none"> • Motorways • A & B roads • Railway lines • Rivers
Acceptable	<ul style="list-style-type: none"> • Unclassified public roads and private roads • Smaller water features, including streams, canals and other water courses • Prominent physical features (eg. ridgelines) • Existing development with strongly established, regular or consistent boundaries • Protected woodland or hedgerows
Likely to be Weaker	<ul style="list-style-type: none"> • Existing development with soft, irregular or inconsistent boundaries (eg. back gardens of residential properties) • Unmade roads • Footpaths • Fences • Field boundaries • Unprotected woodland, trees or hedgerows
Entirely undefined on the ground (e.g. crossing an open field)	<ul style="list-style-type: none"> • A suitable boundary would need to be created

3.19 Initially, the strength, regularity and likely permanence of existing boundaries were analysed. Additionally, the assessment incorporated a degree of professional judgement to identify instances where only very limited strengthening would be required to create suitable boundaries, and the potential for such mitigation to be secured through the development process. This incorporated a degree of judgement as to:

- The scale and degree of mitigation required, including consideration of local context;
- The scale and degree of mitigation when considered in the context of the scale of the Green Belt area as a whole (see [Box A](#));
- Any other contextual factors which might influence the likelihood of the required mitigation coming forward.

¹¹ The lists of potential boundary features included in this table are not intended to be exhaustive.

Box A – Boundary Mitigation

The NPPF states that, when defining boundaries, local planning authorities should 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'. While in many cases it is possible to identify existing features which already meet these criteria, it is recognised that, in a limited number of instances, there may be scope through the development process to restore remnant features or to strengthen existing features. Experience from other emerging Local Plans suggests that, in the absence of existing features, the NPPF requirement can be met by creating certainty in policy terms that suitable boundaries can be created during the plan period (through the implementation of site-specific and/or strategic level policies). This is judged to be suitably exhaustive whilst retaining a degree of pragmatism, necessary given the need to ultimately weigh up a range of factors in determining whether exceptional circumstances exist to justify amending Green Belt boundaries. Such strengthening is also judged to be desirable in order to mitigate the visual impacts of development on the surrounding Green Belt, where possible.

- 3.20 In addition, given the range of different types of area under consideration as part of the assessment, it was considered appropriate to review demarcated boundaries flexibly, considering the potential existence of other surrounding features which might increase or reduce the scale of the area being considered. Therefore, in a number of cases, consideration of the potential for a revised Green Belt boundary consistent with NPPF criteria led to the area of land being re-defined or 'refined'. These refined areas have been given the suffix 'A'.

Table 4: Green Belt Assessment Part Two Update - List of Re-Defined Areas

Part Two Update Ref No	Site Description	District	Part One Recommended Area ID
1.10A	Area North of Chalfont St Peter (Epilepsy Centre Site)	Chiltern	RSA-12
1.13A	Area East of Beaconsfield along A355 (Land West of the Relief Road)	South Bucks	RSA-17
1.14A	Area East of Beaconsfield (Including Wilton Park) – MDS Sub-Parcel	South Bucks	RSA-16
1.14B	Area East of Beaconsfield – Western Sub-Parcel	South Bucks	RSA-16

- 3.21 Further consideration may be given to the potential to create new Green Belt boundaries as part of the overall decision-making process for site allocations as part of the new Local Plan but this does not form part of the Green Belt Assessment Part Two Update.

Summary

3.22 Following completion of the individual elements of the Part Two Assessment, the key findings are summarised for each area. In order to ensure read-across for the assessment as a whole, these have been captured consistently across all areas, setting out:

- Performance against the national purposes for the Green Belt
- Potential for harm to the wider Green Belt objectives and potential for mitigation of this
- Cumulative Green Belt impacts
- Presence of readily recognisable boundaries that are likely to be permanent, or with the potential to provide mitigation to strengthen boundaries or create new boundaries.

Link to Wider Consideration of Exceptional Circumstances

3.23 The NPPF states that '*Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*'. This means that once a Green Belt has been established, something more than general planning concepts are required to justify an alteration; any revision of the Green Belt boundary must satisfy a stringent test for exceptional circumstances. As set out in the [Evolution of the Methodology](#) section, the performance of Green Belt areas in the context of national Green Belt policy is only one aspect of a much broader consideration of potential exceptional circumstances for amending Green Belt boundaries. A definitive conclusion on the question of exceptional circumstances can only be drawn when the findings of the Green Belt Assessment Part Two Update are considered alongside other elements of the Local Plan evidence base. That analysis is captured on a site-by-site basis in the Green Belt Exceptional Circumstances document, and is the point at which consideration is given to the question of whether potential harm to the Green Belt is outweighed by exceptional circumstances.

3.24 There is no prescribed national definition or methodology for assessing whether exceptional circumstances exist or for demonstrating that they do (or not) exist, though the revised NPPF sets out that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries the plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. Ultimately it is an exercise of planning judgement as to whether exceptional circumstances necessitating revision have been demonstrated, with each case having to be judged on its individual facts, in terms of both the specifics of the area of land being considered and the wider strategic function of the Green Belt.

3.25 The approach now embodied in the NPPF is consistent with the judgment of Jay J in the case of *Calverton Parish Council v Greater Nottingham Councils* (2015) EWHC 10784. In that case Jay J set out a number of matters that should be identified and dealt with in order to ascertain whether exceptional circumstances exist to justify rolling back the Green Belt:

- (i) The acuteness/intensity of the objectively assessed need (matters of degree may be important);
- (ii) The inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;

- (iv) The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
 - (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.
- 3.26 In making a case for exceptional circumstances points (i), (ii) and (iii) are general and points (iv) and (v) require consideration of the specific areas or settlement proposed to be released from the Green Belt. This Green Belt Assessment Part Two (along with the Part One report) deals with points (iii), (iv) and (v)
- 3.27 The Part One Green Belt Assessment identified and assessed Green Belt General Areas at the strategic scale within the context of the Buckinghamshire Authorities. However, reflecting the significant contrasts between the Green Belt context in different parts of the County, it did not identify or assess the General Areas as components of the wider Metropolitan Green Belt, which surrounds Greater London and spans numerous local authorities. These cross-boundary relationships are of particular relevance in the context of Chiltern and South Bucks Districts. South Bucks District, particularly the southern area, has a fragmented Green Belt and faces significant development pressures from the south and the east. The use of General Areas in Part One made it difficult to assess the cumulative strategic effects (if any) of a number of Green Belt recommendations. Green Belt is intended as a strategic policy designation and the risk, specific to South Bucks District in the Buckinghamshire context, is that a local assessment fails to acknowledge fully wider strategic risks to the integrity of the Green Belt, in terms of triggering a loss of openness and permanence and allowing sprawl and coalescence contrary to national policy.
- 3.28 To inform the wider consideration of exceptional circumstances by providing further evidence around the broader strategic roles of different areas of Green Belt within the Districts, Chiltern and South Bucks District Councils commissioned a Strategic Green Belt Review¹². The review identified and examined the role of four Strategic Zones of the Metropolitan Green Belt within and beyond the boundaries of Chiltern and South Bucks Districts, acknowledging the strategic, cross-boundary nature of the Metropolitan Green Belt. The assessment had regard to the Green Belt purposes set out in the NPPF, the Zones' sensitivity to change and consideration of the strategic role of the Green Belt in Chiltern and South Bucks Districts in the longer term (to 2036).

Part Two Assessment Pro Forma

- 3.29 Each of the areas of land falling within the scope of the Part Two Assessment has been assessed using a standard pro forma.

4. Conclusions

- 4.1 The completed pro forma are published alongside this document ¹³.
- 4.2 **Table 5** summarises the Green Belt Assessment Part Two Update Purpose Scoring.

¹² Strategic Role of the Metropolitan Green Belt in Chiltern and South Bucks, Arup for Chiltern and South Bucks Districts, March 2018.

¹³ Completed Assessment Pro Forma Volume 1 – Section 1 Areas: Green Belt Part One Assessment Recommended Areas April 2019

Table 5: Green Belt Assessment Part Two Update – Summary of Purpose Scoring

Part Two Ref No	Site Description & District	Part One Area ID	Purpose Assessments					Overall Summary
			Purpose 1: To check the unrestricted sprawl of large built-up areas		Purpose 2: To prevent neighbouring towns from merging	Purpose 3: To assist in safeguarding the countryside from encroachment	Purpose 4: To preserve the setting and special character of historic towns	
			(a) At the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of a gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	Protects land which provides immediate and wider context for a historic settlement, including views and vistas between the settlement and the surrounding countryside	
1.01	North East of Chesham (Lye Green Road Area) <i>Chiltern</i>	RGA-3	Pass	3	1	2	0	Moderate
1.02	Botley <i>Chiltern</i>	RSA-6	Fail	0	0	0	0	Does not meet any Green Belt Purpose

1.03	Area South of Holmer Green (Skimmers Orchard) <i>Chiltern</i>	RSA-9	Pass	3+ or 1+	0	2	0	Moderate or Relatively Weak (depending on adjacent Green Belt in WDC)
1.04	Area North of High Street, Amersham Old Town <i>Chiltern</i>	RSA-8	Pass	3+	1	3	3	Moderate
1.05	Area South of Amersham (Land at Crown Farm) <i>Chiltern</i>	RGA-5	Pass	1+	0	2	3	Moderate
1.06	Area South of Amersham (Between the A413 and A355) <i>Chiltern</i>	RGA-4	Pass	1+	0	3	3	Moderate
1.07	Area North of Little Chalfont (Including Stony Lane) <i>Chiltern</i>	RSA-7	Fail	0	0	2	0	Relatively Weak
1.08	Area South of Little Chalfont (Lodge Lane and Burtons Lane) <i>Chiltern</i>	RSA-10	Fail	0	3	2	0	Moderate

Chiltern District Council and South Bucks District Council

Green Belt Assessment Part Two

Draft Report

Completed Assessment Pro Forma Volume 1 –

Section 1 Areas: Green Belt Part One

Assessment Recommended Areas

April 2019



Chiltern & South Bucks Green Belt Assessment Part Two Update		
Reference No. 1.08	Area Name Area South of Little Chalfont (Lodge Lane and Burtons Lane)	Hectares 163.16
Part One Parcel No. 29 & 35	Part One RGA or RSA No. RSA-10	Part Two Update Cross Reference(s) -

Site Plan



1 – Green Belt Purpose Assessment	
Purpose 1a:	<p>Green Belt Area 1.08 is not at the edge of a distinct large built-up area.</p> <p>Score: Fail</p>
Purpose 1b:	<p>Although the land is adjacent to Little Chalfont, this is not identified as a large built up area for the purposes of this assessment.</p> <p>Score: 0</p>
Purpose 2:	<p>Green Belt Area 1.08 is situated on the southern/eastern extent of Little Chalfont. As a whole, it is judged that Area 1.08 forms much of the wider gap between Little Chalfont and Chalfont St Giles, maintaining the overall openness and scale of the gap. It also forms a smaller, less essential part of the overall gap between Little Chalfont and Chorleywood. However, it should be noted that the area is of a significant scale and its performance against the Purposes varies. The northern part of the area (particularly to the north of Burtons Lane) is adjudged to perform less strongly against this Purpose. This part of Area 1.08 is more closely aligned with the existing built area of Little Chalfont and does not extend into the broader swathe of Green Belt that maintains the gap between Little Chalfont and Chalfont St Giles. It also makes a lesser contribution to preventing a further proliferation of ribbon development along Roughwood Lane and Nightingales Lane.</p> <p>While it is judged that, overall, the Green Belt area maintains the wider gap between Little Chalfont and Chalfont St Giles, the variation in performance across the area should be noted.</p> <p>Score: 3</p>
Purpose 3:	<p>The northern part of Area 1.08 includes a former golf course and a depot site on the eastern edge. The northern area adjoins the urban edge of Little Chalfont to the north and west, with the railway line forming the northern edge of the area. The northern section of Area 1.08 is split from the southern section by a line of development along Long Walk. Due to this edge of built area location and the other uses in this area, the northern part of Area 1.08 has a semi urban-character.</p> <p>The southern and eastern parts of the Area 1.08 contain elements of built-form fronting roads such as the larger houses on Nightingales Lane and the more compact development fronting Long Walk and Lodge Lane. To the south, Area 1.08 opens up into more spaced out development with former farms and open farmland interwoven with areas of woodland. This mix means this section shares a semi-urban character but to a slightly lesser degree than the northern section.</p> <p>Score: 2</p>
Purpose 4:	<p>Green Belt Area 1.08 does not abut an identified historic settlement core and does not meet this Purpose.</p> <p>Score: 0</p>

<p>Green Belt Purpose Conclusion</p>	<p>Green Belt Area 1.08 lies within Parcels 29 and 35, both of which were assessed in Part One as performing moderately overall against Green Belt Purposes.</p> <p>Overall, Green Belt Area 1.08 performs moderately against NPPF purposes, preventing neighbouring settlements from merging (Purpose 2). Overall, Area 1.08 performs relatively weakly in contributing to the openness of the countryside (Purpose 3). Area 1.08 is neither at the edge of a distinct large built up area (Purpose 1) or abutting an identified historic settlement core (Purpose 4), and does not contribute to these Green Belt Purposes.</p> <p>The variation in performance across the area should be noted, with the northern part of Area 1.08 performing less strongly than the southern area against Purposes 2 and 3.</p>
<p>2 – Assessment of Wider Green Belt Objectives & Cumulative Impacts</p>	
<p>Role of the area in terms of wider Green Belt Objectives</p>	<p>There are existing biodiversity opportunities in terms of green corridors and existing woodland. Development of the whole area would harm the landscape covered by the AONB. Although the existing golf course facility has closed, development could allow the creation of new facilities for outdoor sport and/or recreation.</p>
<p>Conflict with the wider strategic function of the Green Belt in the form of cumulative impacts</p>	<p>Green Belt Area 1.08 comprises one complete parcel (Parcel 35) from the Green Belt Assessment Part One, and a sub-area within another parcel (Parcel 29). While it is judged that the release of Area 1.08 would not inherently undermine the performance of the wider Green Belt (the remaining part of Parcel 29 and Parcel 36 to the west), it should be noted that these areas would perform more strongly against Purpose 2, performing a more critical role in preventing the coalescence of Little Chalfont with Chalfont St Giles and Chorleywood.</p>
<p>3 – Boundary Assessment</p>	
<p>Consistency of the area boundary shown on the above location plan with NPPF requirements for permanence and defensibility</p>	
<p>The boundary would be formed by the railway line to the north, Lodge Lane and Roughwood Lane to the east and Nightingales Lane to the west. These features are readily recognisable and likely to be permanent. The boundary would be strong/acceptable in NPPF terms.</p>	
<p>Summary</p>	
<p>Overall, Green Belt Area 1.08 performs moderately against Green Belt Purposes, preventing neighbouring settlements from merging (Purpose 2). Area 1.08 performs relatively weakly in contributing to the openness of the countryside (Purpose 3). The northern part of Area 1.08 performs less strongly against Purposes 2 and 3 than the southern part. Area 1.08 is neither at the edge of a distinct large built up area (Purpose 1) or abutting an identified historic settlement core (Purpose 4), and does not contribute to these Green Belt Purposes.</p> <p>Green Belt Area 1.08 contributes to wider Green Belt objectives.</p> <p>The release of Area 1.08 would not inherently undermine the performance of the wider Green Belt (the remaining part of Part One Parcel 29 and Parcel 36 to the west), but these areas would perform more strongly against Purpose 2.</p> <p>The boundary would be strong/acceptable in NPPF terms.</p>	

Chiltern District Council and South Bucks District Council

Green Belt Assessment Part Two

Draft Report

Appendix 5: Completed Assessment Pro Forma

Volume 2 – Section 2 Areas: Regulation 18 Built Area

Extension Options

October 2016



Chiltern and South Bucks Green Belt Assessment Part Two		
Reference No. 2.10	Area Name Little Chalfont – Area West of Lodge Lane	Hectares 51.22
Part One General Area No. 35		

Boundary Assessment

It is possible to identify a boundary that is permanent and defensible in accordance with NPPF requirements. The northern boundary is the Metropolitan railway line. The eastern boundary is Lodge Lane, the Southern Boundary is Long Walk and the western boundary is Burtons Lane.



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Green Belt Purpose Assessment	
Scoring is the same as Arup's	
Purpose 1a:	FAIL – note area is the same as Green Belt Assessment Part 1 area 35
Purpose 1b:	Score: 0/5
Purpose 2:	Score: 1/5
Purpose 3:	Score: 3/5
Purpose 4:	Score: 0/5
Green Belt Purpose Conclusion:	The area of land scores weakly against one or more Green Belt purpose(s).
Exceptional Circumstances Assessment	
Is there a good fit with the spatial strategy?	Yes – Option C
Would development in the area satisfy sustainable development criteria?	<p>Yes the site is well located to reach the services offered by Little Chalfont. It is outside of the AONB and areas of ancient woodland, the only significant feature within the area, could be incorporated into any development proposed.</p> <p>Development could have a minor adverse impact on:</p> <ul style="list-style-type: none"> • Landscape (Objective 2) – the site is immediately adjacent to the AONB so any development of the area is likely to affect the setting of the AONB. • Biodiversity (Objective 3) development of the area could affect existing biodiversity assets such as ancient woodland and existing hedgerows. • Health (Objective 11). The nearest existing public park is some distance away and the nearest doctors surgery is over 1KM away from the area <p>Development could have a neutral impact on:</p> <ul style="list-style-type: none"> • Cultural Heritage (Objective 1) • Climate Change Mitigation (Objective 4). • Pollution (Objective 7) • Waste (Objective 8) • Economy (Objective 12) <p>Development could have a moderate positive impact on:</p> <ul style="list-style-type: none"> • Housing (Objective 10) • Transport (Objective 9). <p>Development could have an uncertain impact on:</p> <ul style="list-style-type: none"> • Climate Change Adaptation (Objective 5) • Natural Resources (Objective 6)

Looking just at the area of land in question, to what extent would there be conflict with the purposes and integrity of the Green Belt as set out in the NPPF (including wider objectives)?

The area is isolated from the rest of the Green Belt by the network of roads and associated development fronting them to the extent that removal of this area of land from the Green Belt is unlikely to have any conflict with Green Belt purposes. Although the site scores moderately in terms of protecting the countryside from encroachment Purpose 3 – the presence of development to the west, south and north of the proposed area along with the former golf course buildings and depot site to the east mean the area has already suffered a level of encroachment. In terms of wider objectives although the former golf course could be lost if the area was developed there would be opportunities to provide new recreational facilities as part of the development and the existing biodiversity elements such as ancient woodland and hedgerows etc could be protected in any new development.

Looking at the strategic context of the wider area, to what extent is there conflict with the wider strategic function of the Green Belt in the form of cumulative impacts: would release from the Green Belt affect the scoring in surrounding parcels and/or is the scoring affected by judgements about exceptional circumstances in other parcels?

The isolated nature of this area defined as one parcel in the Arup county wide assessments (parcel 35) mean its removal from the Green Belt is unlikely to have wider cumulative impacts. The Green Belt elements of the parcel are surrounded by parcel 29 in the same assessment and as such the scoring of that parcel will not alter as a result of the removal of the proposed site from the Green Belt.

Exceptional Circumstances Conclusion:

This area is separated from the adjacent Green Belt by existing roads. 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. The site could be removed from the Green Belt without harming the wider Green Belt and as such exceptional circumstances exist to justify the sites removal from the Green Belt.

Appendix 13 Extracts from Green Belt Development Options Appraisal, 2017

Chiltern and South Bucks District Councils Emerging Local Plan (2014 – 2036)

Green Belt Development Options Appraisal

Post Preferred Green Belt Options Consultation

November 2017



Chiltern
District Council



South Bucks
District Council

Introduction and Background

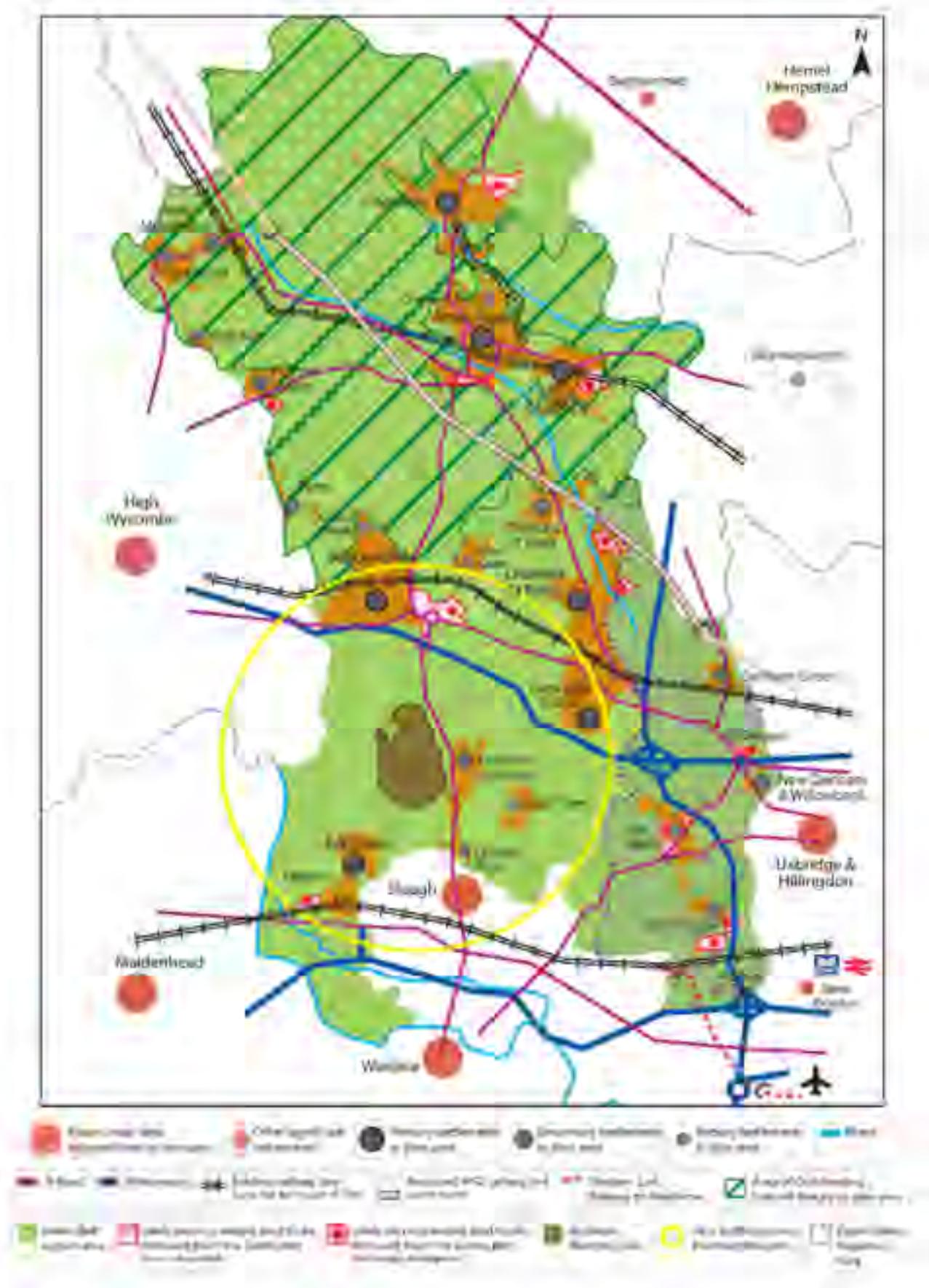
- 1.1 Chiltern and South Bucks District Councils' are preparing a joint Local Plan to cover the period to 2036. As part of the Local Plan the Councils' are undertaking a Green Belt review as they consider that the Plan will not be able to meet its development needs from development opportunities within the built areas, on previously developed land in the Green Belt or in agreed locations outside of the plan area through the Duty to Co-operate. This position remains even after the Buckinghamshire district councils and Bucks Thames Valley LEP agreed for the emerging Vale of Aylesbury Local Plan to plan to accommodate 5,725 dwellings of Chiltern and South Bucks objectively assessed housing need and a proportionate part of their employment needs.
- 1.2 Also despite Chiltern and South Bucks Councils' not being able to meet its own housing needs, Slough Borough Council through the Duty to Co-operate and local plan processes is promoting a Northern Extension to Slough in South Bucks Green Belt to accommodate part of Sloughs' unmet housing needs. The Green Belt review and other relevant evidence base documents for the Chiltern and South Bucks emerging Local Plan will be relevant to on-going discussions and consideration of the Slough Borough Council Northern Extension to Slough option.
- 1.3 The Councils' as part of their Initial Consultation Incorporating Issues and Options (January to March 2016) and evidence base work (e.g. Sustainability Appraisal, January 2016) have identified an emerging Development Strategy for securing sustainable development opportunities that maximise contributing to meeting local development needs, namely:
 - Focusing new development in or close to settlements within the Plan area proportionate to the size and function of those settlements informed by the settlement hierarchy. At the same time taking into account the ability of settlements to support development through adequate and timely delivered infrastructure (e.g. roads, education and health), make effective use of and support local services and facilities, promote a balance of housing, employment, retail, leisure, community facilities, open spaces and other uses whilst promoting and enabling opportunities for reduced need to travel by car. Consider opportunities to enhance the sustainability of existing settlements through development.
 - Review the Green Belt so as to ensure the right balance between protecting and enhancing our important Green Belt areas that contribute to meeting national Green Belt purposes, not just locally but also within our wider region, and releasing land from the Green Belt which can contribute to meeting local needs without undermining the purpose and long term protection of the Green Belt.

- Where development results from land removed from the Green Belt, that development will need to secure environmental, community and/or recreational benefits beyond what would normally be expected from development in order to compensate for Green Belt loss and contribute to the national objectives of the Green Belt and/or parts of the Development Plan (e.g. this Plan and 'made' neighbourhood plans).
- Maximising development opportunities within the Plan area to meet local needs through the right type and mix of uses, making most efficient use of land and where possible increasing densities.
- Maximising development opportunities without compromising the protection, enhancement and setting of important environmental, biodiversity, landscape and heritage assets. Importantly to protect strategic / national important areas such as the Chilterns Area of Outstanding Natural Beauty, Burnham Beeches Special Area of Conservation and Colne Valley Regional Park plus local assets of recognised importance.
- Maximising development opportunities without undermining the required high quality design, layout, appearance or functioning of new development so as to deliver development that recognises and compliments local character and features and which can create or enhance a strong sense of valued place.
- Only allowing new development to occur where that development can be sustained by existing, planned or improved infrastructure as part of the development proposal.

1.4 The draft settlement hierarchy referred to above is as follows:

Primary settlements	Amersham (Old Town and On The Hill), Beaconsfield, Burnham, Chalfont St Peter, Chesham, Gerrards Cross, Little Chalfont
Secondary settlements	Chalfont St Giles, Denham Green, Farnham Common, Great Missenden, Holmer Green, Iver Village, Penn, Prestwood
Tertiary settlements	Chesham Bois, Denham, Farnham Royal, Heath End, Iver Heath, Knotty Green, New Denham & Willowbank, Richings Park, Seer Green, Stoke Poges

1.5 A diagram to illustrate the Development Strategy incorporating emerging strategic Green Belt development options (Section 3 of this report) and key transport connections (existing, under construction and planned) is set out below.



- 1.6 The Councils' have identified and have/are considering a range of Green Belt development options through 'Calls for Sites'; Duty to co-operate discussions; an Initial Consultation Incorporating Issues and Options (January to March 2016); Green Belt Preferred Options Consultation (October to December 2016); a Green Belt Assessment (Part 1 and Draft Part 2); an emerging final Part 2 Green Belt Assessment incorporating a buffer test, the emerging Development Strategy, sustainability principles from the Sustainability Appraisal and a Strategic Green Belt Assessment; and various evidence base work to help inform the appropriateness of development options (e.g. landscape assessment, transport modelling and infrastructure assessments).
- 1.7 The evidence base work is not complete, for example a final Sustainability Appraisal and checks are needed, the Green Belt Assessment Part 2 is being finalised, refined transport modelling is continuing, duty to co-operate discussions are on-going and a Viability Assessment is underway. As such this report cannot be conclusive but is an interim position statement, itself informing final assessment work.

Report Purpose

- 2.1 Options identified in October 2016 were identified in the context of a Draft Green Belt Assessment Part 2 and Green Belt Development Options Appraisal. Matters raised as part of the Preferred Green Belt Options Consultation are being considered and where relevant will be used in finalising the Green Belt Assessment Part 2 along with a Strategic Assessment of the Green Belt (to be published once available); the Green Belt Preferred Options Sustainability Appraisal (published); refined emerging Development Strategy (see 1.3 above); and a Green Belt 'buffer' test.
- 2.2 The purpose of this document is 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. This in turn will inform final stages of the evidence base work to help prepare the draft Local Plan for consultation, anticipated to be in June/July 2018.
- 2.3 **This is not a consultation document but a published evidence base document to inform interested parties of the emerging position likely to be recommended to the Councils' in due course.**
- 2.4 Only the fifteen Green Belt Preferred Options are considered. The Green Belt Assessment Part 2 is not yet complete but will be published as soon as it is available. This will include assessment details of additional options identified

during the consultation however none of these options are expected to be recommended for further consideration based on work undertaken at the time of writing this report. As such no additional options are included for further assessment here.

- 2.5 The primary purposes of this document is to draw together relevant evidence base documents to arrive at the following key emerging conclusions:
- a) Whether or not exceptional circumstances are likely to exist to allow the removal of the Preferred Option from the Green Belt.
 - b) Identify development proposals from the options likely to be recommended to be taken forward in the Local Plan.
 - c) Start to identify planning requirements necessary to secure sustainable development and a high quality development outcome.
- 2.6 It is important to note that this document only considers potential strategic Green Belt changes (sites of 1 ha or more in size with significant development potential). There will be other Green Belt changes recommended to be included in the Draft Local Plan as the Councils' will also be considering existing/committed major development in the Green Belt, settlements washed over in the Green Belt, land that makes little contribution to Green Belt purposes and any necessary Inner Green Belt boundary changes. These are not considered in this document.
- 2.7 In reading the transport infrastructure implications for each option in Section 3 below it is important to be aware that transport impacts have been considered as a whole across each settlement i.e. the combined potential impacts of the Green Belt options, opportunities identified in the emerging Housing and Economic Land Availability Assessment (HELAA), assumptions about development levels in adjacent plan areas and expected 'background' growth in traffic (i.e. natural traffic increases regardless of development). The purpose is to provide a realistic view of the ability of each settlement to absorb the levels of growth proposed and the infrastructure requirements necessary to enable growth to happen. Infrastructure requirements specific to each Green Belt Option is identified in Section 3 however if the development is taken forward they will be expected to contribute towards wider infrastructure requirements referred to within the Draft Infrastructure Delivery Schedule.

Strategic Green Belt Options

3.1 Below is an option index with summary officer recommendations subject to final evidence base work and on-going duty to co-operate discussions. This is followed by a location map with all options and then the appraisal of each option in turn.

Option	Option	Summary Recommendation	Page
1	North East of Chesham	Remove from the Green Belt as a safeguarded area for future residential development	8
2	Area South of Holmer Green	Remove from the Green Belt and include as housing development proposal	15
3	Land East of Hazlemere	Retain in the Green Belt	19
4	Area South of London Road West, Amersham Old Town	Remove from the Green Belt and include part as a housing development proposal	22
5	Area South East of Whielden Street, Amersham Old Town	Remove from the Green Belt as a safeguarded area for future development as open space with potential small scale residential enabling development	26
6	Area South East of Little Chalfont	Remove from the Green Belt and include as a mixed use, housing led development proposal	30
7	National Epilepsy Centre, Chalfont St Peter	Remove from the Green Belt and include as housing development proposal potentially for specialist accommodation for elderly people	35
8	Area South East of Chalfont St Peter	Remove from the Green Belt and include part as a housing development proposal and part protected for Scout Camp use	39
9	Area East of Beaconsfield	Remove from the Green Belt and include as a mixed use, housing led development proposal	43
10	Land North of Denham Roundabout	Remove from the Green Belt and include as an office development proposal	50
11	Land North of Iver Heath, South East of Pinewood	Remove from the Green Belt and identify the open area as a Local Green Space	53
12	Area West of Iver Heath	Remove from the Green Belt as a safeguarded area for future residential led development	57
13	Area North of Iver Station	Remove from the Green Belt and include as a mixed use development proposal	62
14	Area to the East of Ridgeway Business Park, Iver	Remove from the Green Belt as a safeguarded area for future development	69
15	Land adjacent to Taplow Station	Remove from the Green Belt and include as an office development proposal	73



Legend

-  Identified in Green Belt Preferred Options Consultation
-  Local Plan Boundary
-  Built Up Area Outside of the Green Belt



Not to Scale

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Option 6: Area South East of Little Chalfont

Consultation Proposition Summary: The developable area needs to be assessed but could deliver an estimated 850 to 1,000 dwellings. The option is for a mixed use but residential-led development (market and affordable housing, specialist housing for elder people, Gypsy and Travellers and self-build houses), local centre(s), employment, associated infrastructure, community facilities and open space.



Legend

- Identified in Green Belt Preferred Options Consultation
- Local Plan Boundary
- Built-Up Area Outside of the Green Belt



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Evidence Base To-date	Summary of Findings
<p>Summary reasons for Inclusion as an Option for testing</p>	<p>This option was identified as an area recommended to be considered further in the Green Belt Assessment Part 1, included in the Issues and Options Consultation and as a Green Belt Preferred Option.</p> <p>Little Chalfont is a sustainable location with existing infrastructure and services that could have potential for accommodating growth and / or scope for further investment. Chalfont and Latimer Station is close to the option with potential to enabling future resident access by non-car modes. This option is potentially a sustainable location for growth.</p>
<p>Green Belt Preferred Options Consultation</p>	<p>Overall: The Councils received 964 objections to the option, (31.85% of all representations). Of the 964 objecting representations the following issues were the most frequently raised:</p> <p>Infrastructure - 604 (62.66%) Green Belt - 585 (60.68%) Education - 548 (56.85%) Traffic - 530 (54.98%) Health (Hospitals and GPs) - 473 (49.07%) Parking - 426 (44.19%) Biodiversity - 401 (41.60%) Overdevelopment - 393 (40.77%) Transport - 392 (40.66%) Ancient Woodland - 344 (35.68%) AONB - 313 (32.47%) Character - 289 (29.98%) Open Space/ Outdoor Recreation - 141 (14.63%) Ecology - 114 (11.83%)</p> <p>In response to what should be sought from development, the most frequently stated improvements where (number of respondents indicated in brackets):</p> <ul style="list-style-type: none"> • Improvements to school provision (46); • Healthcare Provision (24); • Parking (20); • Infrastructure improvements (16); and • Road improvements (14). <p>Key Duty to Co-operate Organisation's Summary Comments.</p> <p><u>Natural England</u> - Identified factors to consider as part of any development include: potential 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). Opposed to the release of the parcel given the potential impacts on Ancient Woodland ('which would require 30m buffer from development') and other priority habitats within the option, the Woodland Trust also raised concerns given the presence of Ancient Woodland.</p> <p><u>Environment Agency</u> - Due to the proposed increase in urbanised catchment, flood risk from the River Misbourne could increase.</p> <p><u>Chiltern Clinical Commissioning Group</u> - Option 6 would be one of the more preferable options however primary care services will be required to expand/be modified in order to cope with the population and demographic growth.</p> <p><u>Transport for London</u> - Supportive to the principle of the land being released for development.</p> <p><u>Buckinghamshire County Council</u> - Raise concerns on the potential impact to the open countryside and setting of the AONB and also stated that removing the site from the Green Belt would harm the wider Green Belt. Unlikely to be supported</p>

Evidence Base To-date	Summary of Findings
	<p>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. Will require Transport Assessment. Identified as having a moderate ecological sensitivity.</p> <p>Other Key Consultees Summary, including Parish/Town Councils and land owners.</p> <p><u>Chilterns AONB Conservation Board</u> - Considered that (although outside of the AONB) the option, if developed, may impact on its setting as well as issues with abstracting water from the River Chess and Ancient Woodland within the site.</p> <p><u>Village Way Residents Association</u> and <u>Loudhams Wood Lane Management Company</u> - Stated that there are legal covenants in place which would restrict potential accesses from Village Way and Loudhams Wood Lane respectively.</p> <p><u>Little Chalfont Parish Council</u> and <u>Little Chalfont Community Association</u> - Expressed that there were no 'exceptional circumstances' to warrant the site being released from the Green Belt.</p> <p><u>The Woodland Trust</u> - Within the site boundary lie two areas that are listed on the Natural England ancient woodland inventory and which are also woodland priority habitat. Measures will have to be incorporated (such as semi-natural and natural spaces) in order to minimise impacts.</p> <p><u>Biddulph (Buckinghamshire) Ltd</u> - Supportive of the option coming forward for development.</p> <p><u>Berks, Bucks and Oxon Wildlife Trust</u> - Opposed to the release of the parcel given the potential impacts on Ancient Woodland ('which would require 30m buffer from development') and other priority habitats within the option.</p>
Follow Up Duty to Co-operate Discussions	The County Council has been requested to clarify the reasons for their concerns.
Landscape Assessment (subject to comments from Natural England and where relevant Chilterns AONB)	<p>Development 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.</p> <p>Within these constraints, much of the higher ground within the former golf course could be developed, leaving the lower dry valleys undeveloped as distinctive landforms and buffer to protect the areas of ancient woodland. An area of development could be accommodated on higher ground to the south-east of properties on Loudhams Wood Lane, within the curtilage of the existing residential property. A further area of development could be accommodated in the south-east, leaving the dry valley open. The industrial estate has capacity to take intensified development, subject to the protection of the woodland setting and adjacent ancient woodland.</p> <p>Recommended mitigation and enhancement is a combination of native woodland planting along the margins of adjacent woodland blocks, graded down to native shrubs and long grass margins, leaving the dry valleys as open grassland managed for wildlife and public access, including links between the settlement and the AONB, and contributing to the wider green infrastructure as well as above recommendations. In the south-eastern part of the site development offers the opportunity to soften the edge of settlement with new woodland planting linked to existing woodland.</p> <p>Lower density housing should be located on the eastern side of the site towards the AONB.</p>
Infrastructure	Primary Education: The County Council as Education Authority provided comments on the proposals Option 6 as part of their consultation response to the Green Belt Preferred Options Consultation. This considered the impacts on

Evidence Base To-date	Summary of Findings
	<p>education infrastructure arising from 1000 new dwellings. Based on this, BCC advised that a 1.6ha site to provide a new 1.5FE primary school including pre-school would be required. In addition to the provision of land, financial contributions toward primary education infrastructure would also be required.</p> <p>Following this, BCC were asked to consider a lower growth scenario for Option 6, consisting of 700 new dwellings. BCC have advised that this would require 1ha land within the option either the provision of a new 1FE primary school including 52 place pre-school or the expansion of an existing primary school through a split site. In addition to the provision of land, financial contributions toward primary education infrastructure would also be required.</p> <p>Health: The CCG have provided comments through the Green Belt Preferred Options Consultation. They feel that Amersham / Little Chalfont is one of the more preferable locations for development, however they also note that the development of Options at Amersham and Little Chalfont (4, 5 and 6) would require primary care services to expand or undergo modification in order to cope with population and demographic growth. Financial contributions from developers towards health infrastructure would likely be required.</p> <p>Other: Affinity Water has advised that there are no strategic limitations on drinking water supply for the level of growth in the joint Local Plan.</p> <p>Waste water – Based on the level of growth in the Green Belt Preferred Options, Thames Water advised that local upgrades to the waste water network is likely to be needed to meet demand. In addition the site is within 15m of a pumping station and this may require specific mitigation at planning application stage to ensure that there is no issue with odour and noise for new occupiers. In relation to the refined options Thames Water have advised that their previous advice is still applicable.</p> <p>Flood risk – the scope of level 2 SFRA is to be determined but this site is likely to need evidence on the mitigation of the potential impacts on the area of surface water flooding within the site will be addressed. This should link into the green infrastructure requirements and the landscape assessments referred to in other sections of this table.</p>
<p>Green Infrastructure (subject to on-going evidence base work and policy requirement for amenity and recreational space including children play space)</p>	<p>Introduction of public access into area including links between settlement and AONB and possibly to reinstate pedestrian access over disused railway bridge to north. Long-term management of woodland, including ancient woodland blocks. Create new woodland links between woodlands. Replacement of exotic species in former golf course, particularly along northern edge. New planting to industrial estate entrance and along Lodge Lane to enhance views from Lodge Lane and the edge of the AONB</p>
<p>Gypsy, Traveller and Travelling Showpeople</p>	<p>Accommodation needs remain within the plan area following the updated needs assessment for which urban extensions continue to need to be considered to provide pitches / culturally suitable accommodation.</p>
<p>Deliverability (not including Viability)</p>	<p>Land Owner(s): Not all landowner positions are known at this stage although a landowner for a key part of the option (former golf course) is promoting development.</p> <p>Timing: The Housing Delivery Study for Buckinghamshire concludes that 400 dwellings could be deliverable by 2033 and 70 dwellings per annum after resulting in 610 dwellings that could be delivered in the plan period. This is as part of a longer phased development and within the context of an agreed masterplan.</p>
<p>Preferred Options Sustainability Appraisal</p>	<p>The Option will deliver major beneficial outcomes for delivering new housing and medium outcomes for transport and accessibility. The Impact on the economy will deliver low beneficial outcomes. Impacts on cultural heritage will be neutral.</p>

Evidence Base To-date	Summary of Findings
	Landscape, natural resources, pollution, health and waste are measured as low adverse effects and for climate change mitigation and biodiversity as a medium adverse effect.
Conclusion	<p>Remove from the Green Belt and include as mixed use residential-led development to secure at least 700 dwellings (including an appropriate proportion of affordable units), specialist accommodation for elderly people, Gypsy and Traveller pitches, self-build and custom-build opportunities and associated uses, open spaces and infrastructure through a comprehensive development in accordance with an approved development brief.</p> <p>Mix of uses to include the retention of existing employment space and possible redevelopment and/or expansion for new employment opportunities.</p> <p>Creation of a neighbourhood centre to provide a clear sense of place and community through careful urban design, layout, use of densities and dwelling types, strategic open space and as a hub for pedestrian and cycle connectivity within the site. The centre to include local retail, services and facility opportunities and where appropriate to be associated/connected with built infrastructure requirements (e.g. a primary school and other community facilities). Consideration for accommodating Little Chalfont relocated and improved existing community uses/facilities (and their existing site reuse or redevelopment for other uses) to be encouraged.</p> <p>The development brief to include;</p> <ul style="list-style-type: none"> • A proposed open space framework to secure: <ul style="list-style-type: none"> a) Wherever possible retention of woods, trees, hedgerows and landscape features (e.g. dry valley) b) New strategic landscaping and open space to provide a satisfactory buffer to the Chilterns AONB/countryside c) Wider benefits such as recreation and amenity space and a net gain in biodiversity (e.g. through habitat management/enhancement and biodiversity off-setting) d) Ability to secure measures to ensure the framework continued protection and management. • Secured pedestrian and cycle connectivity, including with passenger transport opportunities, with the Little Chalfont and Chalfont and Latimer Railway Station. • Timely delivery of sufficient and necessary infrastructure, including sustainable transport measures. <p>Principle vehicular access to be off Burtons Lane with scope to provide an alternative or improved access to the existing employment uses. Limited access and alteration to Lodge Lane so as to retain its country lane character and incorporated into the landscape buffer with the Chilterns AONB.</p>

Appendix 14 Extracts from Green Belt Exceptional Circumstances Report, 2019

Chiltern and South Bucks Local Plan 2016-2036 Emerging Local Plan Evidence Base

Green Belt Exceptional Circumstances Report

May 2019



CHILTERN
District Council



SOUTH BUCKS
District Council

Stronger in partnership

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1. Introduction

What does this technical paper cover?

- 1.1. This paper covers the Metropolitan Green Belt in Chiltern and South Bucks and sets out the proposed changes to the Green Belt boundary in a number of locations across the Districts.

What Green Belt changes are being proposed?

- 1.2. The Local Plan proposes to remove the following areas of land from the Green Belt for different types of development to contribute to meeting local needs and/or future opportunities¹:

- Area South East of Chalfont St Peter (Winkers), RSA-15/1.11; [BP SP8]
- Area South East of Iver (West of the M25), RGA-2/1.29;[BP SP12]
- Area South of Holmer Green (Skimmers Orchard), RSA-9/1.03;[BP SP3]
- Area East of Beaconsfield including: [BP SP9]
 - Along A355 (Land West of the Relief Road), RGA-17/1.13A;
 - (Wilton Park) MDS Sub Parcel, RGA-16/1.14A;
 - Western Sub Parcel, RSA-16/1.14B;
 - South of Pyebush Roundabout, RSA-18/1.15.
- Areas adjacent to Iver Heath, 1.20;[BP SP10]
- North East of Chesham (Lye Green Road Area), RGA-3/1.01; [BP SP2]
- Area South of Amersham (Land at Crown Farm), RGA-5/1.05; [BP SP5]
- Area South of Amersham (Between the A413 and A355), RGA-4/1.06; [BP SP4]
- Area North of Chalfont St Peter (Epilepsy Centre site), RSA-12/1.10A; [BP SP7]

¹ Please note local plan site allocation policy numbers are indicated in square brackets above eg [BP SP XX]. Site names throughout this document are taken from the Arup Buckinghamshire Green Belt assessment Part One and may differ from the site names given in the local plan site allocation policies.

1.3. The Local Plan proposes to remove the following areas of land from the Green Belt for extensions to existing settlements for different types of development intending to contribute to meeting local needs and/or future opportunities:

- Little Chalfont – Area West of Lodge Lane, 2.10;[BP SP6]
- Land East of Thorney Lane Industrial Estate (North of Iver Station), 2.32A; [BP SP11].

1.4. The Local Plan proposes to remove the following areas of land from the Green Belt for different types of employment development to contribute to meeting local needs and/or future opportunities:

- Land at Denham M40 Junction 1, Denham, 3.07C; [BP SP13]
- Land South of Taplow Station, 3.09A. [BP SP 14].

1.5. The following areas have been identified as no longer performing Green Belt function:

- Land North of Iver Heath (Including Pinewood Studios), RSA-23/1.19;
- Iver Heath – South East of Pinewood, 2.22;
- Taplow Riverside Area, RGA-8/1.23

1.6. This paper explains the justification for this approach and demonstrates the 'exceptional circumstances' which justify all the above revisions to the Green Belt required to meet this test.

1.7. Appendix 1 of this Report shows the results of the exceptional circumstances assessment for each of the Green Belt areas set out above.

1.8. The Review of Settlements within the Green Belt Study (January 2016) identifies 12 villages considered not to contribute to the openness of the Green Belt:

- Denham;
- Botley;
- Ley Hill;
- South Heath;

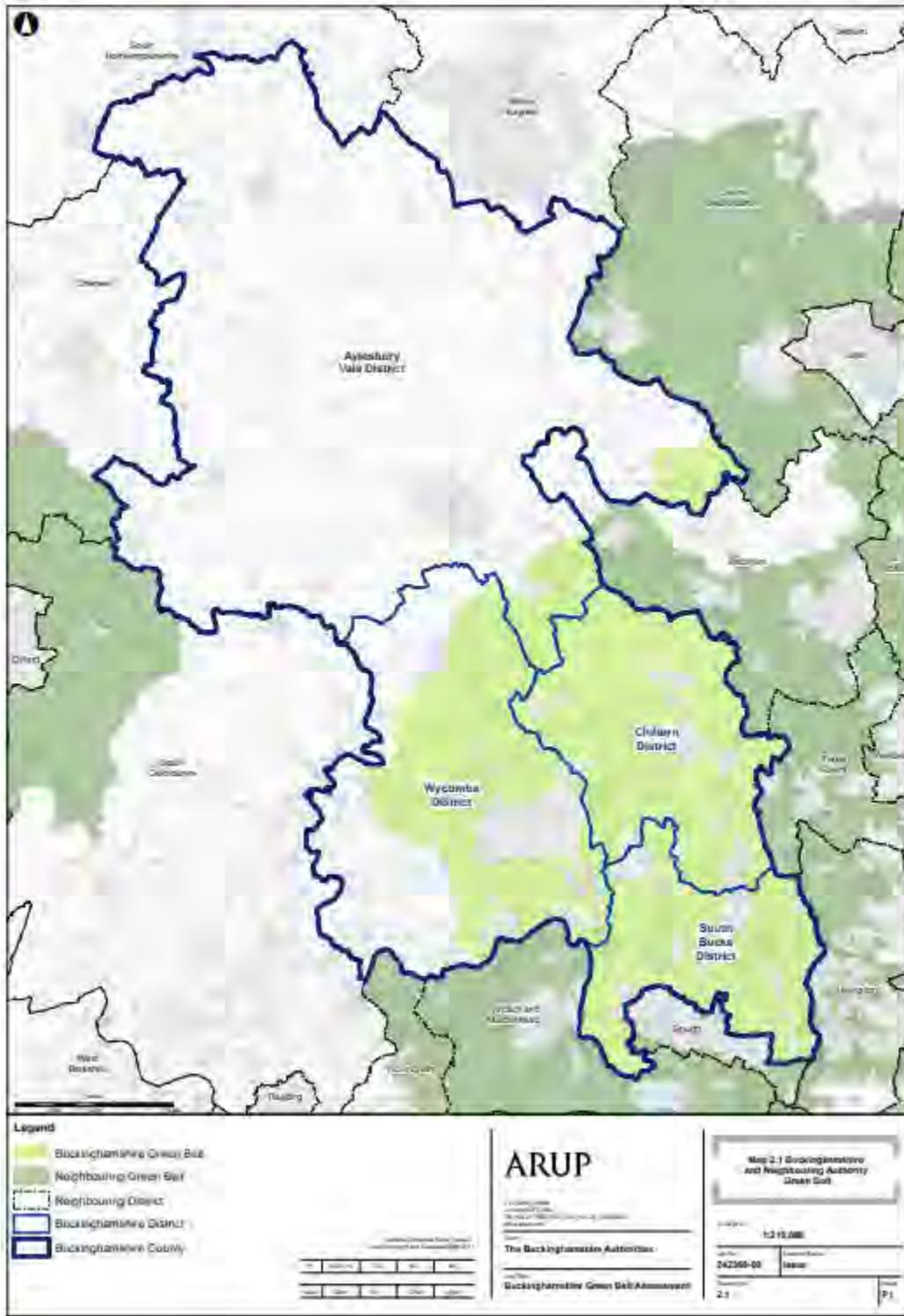
- Hyde Heath;
- Little Kingshill;
- Winchmore Hill;
- Jordans;
- Dorney Reach;
- Higher Denham;
- Tatling End;
- Wexham Street.

What are the key evidence studies?

1.9. The following evidence studies have informed the Green Belt boundary revisions and should be read alongside this technical paper:

- Buckinghamshire Green Belt Assessment Part 1;
- Chiltern and South Bucks Green Belt Assessment Part 2;
- Inner Green Belt Boundary Review (April 2019);
- Settlement Study;
- Settlement Capacity Study;
- Review of Settlements in the Green Belt;
- Local Housing and Economic Needs Assessment, ORS (April 2019);
- Housing and Economic Development Needs Assessment, Update 2016, ORS (September 2017);
- Housing and Economic Development Needs Assessment, ORS (December 2016);
- Housing and Economic Land Availability Study (HELAA), Update March 2019;
- Gypsy and Traveller Accommodation Topic Paper (April 2019);
- Brownfield Land Register (updated 2018);
- Housing Trajectory, April 2019;
- 5 Year Housing Land Supply, April 2019.

Map 1: Buckinghamshire and Neighbouring Authority Green Belt²



² Green Belt Assessment Part 1 (March 2016) – Final Report Maps, ARUP

2. What are the key issues for this paper?

2.1. Green Belts are one of the best known and oldest national planning policies. They are designed to serve the following five purposes³:

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

2.2. The Green Belt, which covers some 88% of Chiltern and 87% in South Bucks Districts, is part of the London Metropolitan Green Belt which extends north into part of Aylesbury Vale and west into Wycombe Districts.

2.3. Green Belts perform a number of other useful functions. They make a contribution to green infrastructure, which is important to the successful functioning of urban areas and their relationship with the rural areas around them. Green Belts improve the connectivity between areas designated for their environmental importance, urban green spaces and the wider countryside to form ecological networks and green recreation networks. Significant parts of the Chiltern and South Bucks Green Belt also fall within the Chilterns Area of Outstanding Natural Beauty and Colne Valley Regional Park which, although in themselves do not justify or strengthen their Green Belt status, their objectives, policies and activities support the type of uses appropriate for established Green Belt areas.

2.4. The Chiltern and South Bucks Green Belt can be characterised as being on the edge of the major urban areas of Slough, Uxbridge, Maidenhead and Wycombe and containing a number of medium to small settlements, some in the Green Belt and some excluded, and often in close proximity to adjacent settlements. The Green Belt contains a number of historic developed areas, some major developments and is dissected in a number of places by motorways, main roads

³ National Planning Policy Framework (NPPF), February 2019, Para 134

and railways. The area is subject to considerable development pressures and as such the Green Belt has performed a number of key Green Belt purposes since being introduced including the prevention of the unrestricted sprawl of adjacent major urban areas, the coalescence of settlements and protection of the countryside from encroachment.

- 2.5. The Green Belt constrains the opportunities to meet our Local Housing Need (LHN), as well as other growth requirements. The Local Plan faces particular challenges in balancing and/or reconciling competing, and potentially conflicting, objectives.
- 2.6. National planning policy makes provision for changes to be made to the Green Belt. It requires Green Belt boundaries and policies to be established in Local Plans. However, it states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of Plans."
- 2.7. To assist us in determining where to strike the balance between meeting our LHN and other needs and protecting the Green Belt, the Councils commissioned with the other Buckinghamshire authorities a Part 1 Green Belt review from external consultants and following their recommendations, have undertaken a Part 2 Green Belt review. By these two stages there is:
 - A comprehensive assessment of the extent to which the land in the Green Belt in Chiltern and South Bucks continues to fulfil the purposes of the Green Belt as defined in the NPPF;
 - An evaluation of the sensitivity of the land to any development; and
 - Consideration at a detailed level of the potential for Green Belt release in the light of the assessments' conclusions.
- 2.8. By this process, land which could be released from the Green Belt has been identified.

2.9. The NPPF⁴ states that “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” The NPPF then sets out three matters to be tested. These are whether the strategy of the plan:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies concerning the effective use of land in the NPPF, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

2.10. In addition the NPPF⁵ emphasises the need to promote sustainable patterns of development.

2.11. The approach embodied in the NPPF is consistent with the judgment of Jay J in the case of *Calverton Parish Council v Greater Nottingham Councils* [2015] EWHC 1078 (Admin). In that case, Jay J set out a number of matters that should be identified and dealt with in order to ascertain whether ‘exceptional circumstances’ exist to justify rolling back the Green Belt:

- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- ii. the inherent constraints on supply/availability of land *prima facie* suitable for sustainable development;
- iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- iv. the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and

⁴ NPPF February 2019, para 137

⁵ NPPF February 2019, para 138

- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

2.12. In making a case for exceptional circumstances points (i), (ii) and (iii) are general, whilst points (iv) and (v) require consideration of the specific areas or settlement proposed to be released from the Green Belt. The case for release of land from the Green Belt has been assessed according to these criteria.

3. Exceptional Circumstances

a) **The acuteness/intensity of the need for new homes, employment and retail provision**

3.1. Our evidence concludes that the LHN for housing in Chiltern and South Bucks is 15,260 dwellings or 763 homes per year over the period 2016-2036⁶.

3.2. As part of this, the LHN identifies a need for:

- At least 4,251⁷ affordable housing units;
- 5,347⁸ specialist units for elderly residents accommodation;
- 85 Gypsy and Traveller pitches⁹ or culturally appropriate accommodation;
 - 15 pitches (non-travellers);
 - 33 pitches for South Bucks (non-travellers);
 - 37 (unknowns);
 - 4 Travelling Showpeople plots.

3.3. As well as the need for homes over the plan period, our HEDNA¹⁰ evidence identifies:

- A shortfall of 117,000sqm (23 hectares) of B1a/b employment land;
- A shortfall of 29,000sqm (7 hectares) of B1c/B2;
- A shortfall of 98,000sqm (20 hectares) of B8.

3.4. Due to Green Belt restrictions covering 87.6% of the Plan area and Chilterns AONB restrictions covering 42.5% of the Plan area, the Councils have limited unconstrained land available to meet their needs. The settlements within the Districts are either located within the Green Belt or are built right up to edges of the Green Belt. This has made it more difficult to accommodate development

⁶ HENA, April 2019, Para 3.4

⁷ HENA, Report of Findings, April 2019, Figure 44

⁸ HEDNA Draft Update, March 2019, Figure 48

⁹ HENA, Report of Findings, April 2019, Para 6.87

¹⁰ Buckinghamshire HEDNA Update 2016 – Addendum Report, Opinion Research Services, Atkins, Figure 52

than in other areas where unconstrained land availability is greater.

Five Year Housing Land Supply

- 3.5. As well as meeting our overall housing needs, Government guidance requires us to identify deliverable sites for the first five years of the plan. A deliverable site is a viable site that is available for development now, in a suitable location for housing, with a reasonable prospect of housing delivery on site within five years. Our five year housing supply position equates to just 1,904 new homes.
- 3.6. The housing trajectory shows that we do not have sufficient deliverable sites to meet this requirement without a contribution from Green Belt land and would also not be able to meet need over the 10 year and remaining plan periods. Green Belt sites provide the only option in terms of pulling additional sites into this five year period and beyond.
- 3.7. In planning for housing needs, an appropriate buffer is also required in order to reduce the risks associated with non-delivery and to allow for some level of contingency. Due to the nature of the supply, particularly in the early stages of the Plan, we are heavily reliant on a large number of small sites and a small number of large sites. Without consideration of Green Belt options, no buffer can be provided and there is an absence of choice and type or size of housing development opportunity.
- 3.8. The Green Belt sites provides us with viable sites, parts of which are available for development straight away and can help us to meet the more immediate shorter-term need enabling some local people to gain access to the resulting affordable housing that is developed.

Employment Needs

- 3.9. The needs for employment uses are in a similar position as most existing employment sites are in use or have limited scope for making significant contributions for meeting business and employment needs.

Affordability

- 3.10. The Buckinghamshire HEDNA¹¹ states that house prices in Buckinghamshire have been around £60,000-80,000 above the English average over the period since 2001, but that figure has risen in recent years. Lower quartile house prices are higher than the national average, with a lower quartile price of £228,000, compared to England's £134,000 (based on 2014-15 values).
- 3.11. The HENA¹² 2019 study states that in South Bucks, the total of households owned has increased from 69% (1981) to 75% in 2011. Private rent has risen, with a third of tenants renting privately in 1981 and more than half in 2011. The HENA study states that house prices in Chiltern and South Bucks have increased substantially in the period 2001-2008.
- 3.12. As an example, the latest information we have states that average private sector rents in 2015-16 in Buckinghamshire HMA are above the national average (£1,113 pcm cf. £820 pcm) although market rents are higher in comparator areas.¹³

b) The inherent constraints on supply/availability of land prima facie suitable for sustainable development

- 3.13. There has historically been little available land for development in Chiltern and South Bucks due to:
- a) 87.6% of the Plan area being part of the Metropolitan Green Belt;
 - b) 42.5% being in the Chilterns Area of Outstanding Natural Beauty;
 - c) numerous other protected areas such as scheduled monuments, Ancient Woodlands, Sites of Special Scientific Interest, historic gardens, conservation areas and listed buildings;

¹¹ HEDNA, ORS, 2016, Figure 119

¹² Chiltern and South Bucks Housing and Economic Needs Assessment 2019, Report of Findings, April 2019, Opinion Research Services

¹³ Buckinghamshire HEDNA Update, Opinion Research Services, Atkins, December 2016, Para 7.75

- d) areas protected for other purposes such as in the Colne Valley Regional Park and Burnham Beeches SAC;
- e) areas at risk of flooding; and
- e) Minerals Safeguarding Areas.

3.14. The towns and villages are tightly constrained by the Green Belt with no scope for expansion within their settlement boundaries. In addition, a number of villages are “washed over” by the Green Belt. This significantly limits our ability to meet our objectively assessed needs without some incursion into the Green Belt.

c) Making as much use as possible of suitable brownfield sites and underutilised land

Brownfield Register

3.15. From December 2017, the Councils have maintained registers of brownfield land. The following table summarises these registers.

Table 1: Chiltern and South Bucks Brownfield Register

Review 2018	Chiltern Register	South Bucks Register	Combined Supply from the Registers
No. of sites	33	22	55
Dwelling Capacity	789 - 919	784 - 1003	1573 - 1922

Source: Brownfield Land Register (Review 2018)

3.16. The above table shows a small supply of available brownfield sites across the Plan area, however this does not necessarily identify all underused sites and other sites would expect to be available in the Plan period. To ensure that all available previously developed and underutilised sites have been considered, the

Chiltern and South Bucks Housing and Economic Land Availability Assessment looks at all potential sites.

Housing and Economic Land Availability Assessment (HELAA)

- 3.17. The HELAA identifies capacity for 1,458 dwellings over the plan period without considering Green Belt options. These include sites on the Brownfield Register and other wide ranging sources to identify sites including a call for sites and an estate renewal study.
- 3.18. Site capacity was assessed initially using a standard density of 50 dwellings per hectare (dph) for town centre sites and 30 dph for all other areas. The methodology allows for these densities to be adjusted as the site goes through the assessment process provided that the reason for this adjustment is clearly set out.
- 3.19. The HELAA was subjected to examination and challenge by Aylesbury Vale District Council, Wycombe District Council and Buckinghamshire County Council. In relation to AVDC this included their appointment of G L Hearn Limited to scrutinise the Chiltern and South Bucks options for meeting housing needs locally and so not rely on the Vale of Aylesbury Local Plan to help meet need.

d) Consideration of the consequent difficulties in achieving sustainable development without impinging on the Green Belt

- 3.20. As the evidence base demonstrates, the Councils have exhausted all possible opportunities including the use of previously developed land in the Green Belt to meet our identified needs. The release of Green Belt land contributes to meeting these requirements.
- 3.21. The Local Plan takes into account all of the evidence the Councils have prepared and identifies a sustainable development strategy to meet these needs and requirements. The Sustainability Appraisal report sets out how reasonable alternatives have been generated and considered.

- 3.22. Meeting all of our objectively assessed development needs requires the suitable and available land within the Districts to be used, including some Green Belt sites.

Enabling development outside of the Councils boundary

- 3.23. As was clear from the conclusions of the Part 1 Green Belt review (see below), the likely scale of acceptable Green Belt release when taken with the other sources of land supply, was not likely to be able to meet those needs in full. In consequence, Duty to Co-operate discussions to explore whether some needs could be met in adjacent Plan areas were held. Given the Green Belt constraints affecting the adjoining administrative areas, the only potential for providing for the Districts' unmet needs was identified in Aylesbury Vale District. In the light of this, it was agreed that Aylesbury Vale could accommodate up to 5750 dwellings as they are a relatively unconstrained part of the Buckinghamshire Housing Market Area mostly lying outside of the Green Belt and the AONB.

- 3.24. In their submission version of the Vale of Aylesbury Local Plan, Aylesbury Vale have agreed¹⁴ to provide 5,750 dwellings towards Chiltern's and South Bucks' unmet housing needs. The Examination Planning Inspector has not challenged the inclusion of this figure in his interim findings.

- 3.25. If this provision towards Chiltern and South Bucks unmet housing needs is not retained in the adopted Vale of Aylesbury Local Plan, the Councils would be incapable of sustainably meeting their housing needs.

e) The nature and extent of harm to this Green Belt (or those parts of it which would be lost if boundaries were reviewed)

- 3.26. The Councils commissioned with the other Buckinghamshire authorities a Part 1 Green Belt review from external consultants and, following their recommendations, have undertaken a Part 2 Green Belt review. By these two

¹⁴ Memorandum of Understanding with AVDC, 03 January 2018

stages there has been:

- A comprehensive assessment of the extent to which the land in Chiltern and South Bucks fulfils the purposes of the Green Belt as defined in the NPPF;
- An evaluation of the sensitivity of the land to any development;
- Consideration at a detailed level of the potential for Green Belt release in the light of the assessments' conclusions.

f) The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent

3.27. The Councils are committed to ensuring a sustainable approach to development is adhered to, within the plan period, and beyond. The previous section shows that the release of these Green Belt sites will not damage the overall purposes of the Green Belt as a whole in each location. However, appropriate mitigation measures can help to reduce any impact further.

3.28. The Local Plan policies aim to mitigate the loss of Green Belt land by ensuring development schemes maintain any physical boundaries that provide visual and functional separation from the Green Belt, and enhance these, where possible. Schemes will incorporate effective landscaping schemes and buffers, where required, to create appropriate transitions.

3.29. The Councils have only released sites that they consider are suitable for development.

3.30. In terms of identifying whether, having regard to the Part 1 and Part 2 Green Belt reviews exceptional circumstances exist to justify changes to the boundaries of the Green Belt, the following criteria were used:

- Performance against Green Belt Purposes;
- Maintenance of strong defensible Green Belt boundaries;

- The extent to which the consequent impacts on the purposes of the Green Belt can be mitigated against to ensure that any harm is kept to the lowest practicable extent;
- The balance of advantage and disadvantage in relation to each site individually in the context of the need but taking into account potential cumulative effects;

4 Review of areas

4.1 The Green Belt Review recommends that the following sites could be released from the Green Belt, without damage to its overall Green Belt Purpose. Revisions to the Green Belt are based on recognisable features, with strong defensible boundaries. They are shown to have minimal impact on the Green Belt purposes:

4.4 Review of potential extension areas¹⁵ to built up areas:

Little Chalfont - Area West of Lodge Lane, 2.10

Performance against Green Belt Purposes:

Area 2.10 performs moderately against NPPF purposes.

There are existing biodiversity opportunities in terms of green corridors and existing woodland. Although the existing golf course facility has closed, development could allow the creation of new facilities for outdoor sport and/or recreation.

Maintenance of strong defensible Green Belt boundaries:

The boundary would be formed by the railway line to the north, Lodge Lane to the east and Burtons Lane to the west. These features are readily recognisable and likely to be permanent. The boundary would be strong and acceptable in NPPF terms.

The extent to which the consequent impacts on the purposes of the GB can be reduced to the lowest practicable extent:

Development would be designed to:

- create a transition from urban to rural character using new development height, materials, density and landscaping to create a permeable edge;
- Define the Green Belt edge using a strong and natural visual barrier;
- Retain landscape features to maintain their Green Belt value.

The balance of advantage and disadvantage in relation to each site individually in the context of the need:

Advantages:

- Area 2.10 is not at the edge of a distinct large built up area (Purpose 1);
- Area 2.10 performs relatively weakly in contributing to the openness of the countryside (Purpose 3);
- Area 2.10 does not abut an identified historic settlement core (Purpose 4);
- The boundary would be permanent and defensible and acceptable in NPPF terms;

¹⁵ Green Belt Part Two, Appendix 5: Completed Assessment Pro Forma, Volume 2 - Section 2 Areas: Regulation 18 Built Area, Extension Options, October 2016

Classification: OFFICIAL

- The release of Area 2.10 would not undermine the purposes of the wider Green Belt;
- Highly sustainable location within 700 metres of Chalfont & Latimer Railway Station and close to the village local centre.

Disadvantages:

- Area 2.10 performs moderately against the NPPF purpose of, preventing neighbouring settlements from merging (Purpose 2).

Indicative capacity: 850-1000 dwellings including 340-400 Affordable Housing units.

Conclusion:

Overall, the Area performs moderately against one purpose of the Green Belt.

The site can make a very significant contribution to meeting the development needs of the Districts in a highly sustainable location within 700 metres of Chalfont & Latimer Railway Station and close to the village local centre. The impacts on the Green Belt can be mitigated and a firm and defensible boundary either exists or can be provided. The benefits of the release of the site and its subsequent development clearly outweigh the dis-benefits.

Exceptional circumstances therefore exist for the release of this site from the Green Belt.

Area South of Little Chalfont (Lodge Lane and Burtons Lane), RSA-10/1.08

Performance against Green Belt Purposes:

Area 1.08 performs moderately against NPPF purposes.

There are existing biodiversity opportunities in terms of green corridors and existing woodland. Development of the whole area would harm the landscape covered by the AONB and could involve major development. Although the existing golf course facility has closed, development could allow the creation of new facilities for outdoor sport and/or recreation.

Maintenance of strong defensible Green Belt boundaries:

The boundary would be formed by the railway line to the north, Lodge Lane and Roughwood Lane to the east and Nightingales Lane to the west. These features are readily recognisable and likely to be permanent. The boundary would be strong/acceptable in NPPF terms.

The extent to which the consequent impacts on the purposes of the GB can be reduced to the lowest practicable extent:

Development would be designed to:

- Create a transition from urban to rural character using new development height, materials, density and landscaping to create a permeable edge;
- Define the Green Belt edge using a strong and natural visual barrier;
- Retain landscape features to maintain their Green Belt value.

The balance of advantage and disadvantage in relation to each site individually in the context of the need:

Advantages:

- Area 1.08 is neither at the edge of a distinct large built up area (Purpose 1) or abutting an identified historic settlement core (Purpose 4), and does not contribute to these Green Belt Purposes;
- Area 1.08 performs relatively weakly in contributing to the openness of the countryside (Purpose 3);

- The boundary would be strong and acceptable in NPPF terms.

Disadvantages:

- Area 1.08 performs moderately against Green Belt Purposes;
- Prevents neighbouring settlements from merging (Purpose 2);
- Would constitute major development in the AONB.

Indicative capacity: 3,000 – 4,000 dwellings including 1,200-1,600 Affordable Housing units.

Conclusion:

Overall, the area performs moderately against the Green Belt Purposes. A strong and acceptable boundary can be identified in NPPF terms.

Development of the whole area would harm the landscape covered by the AONB. Removal of this area from the Green Belt would lead to significant harm to the AONB by reason of major development in the AONB. Whilst the site could, if developed, make a significant contribution to meeting development needs, the disbenefits of doing so, particularly the effect on the AONB outweigh the benefits of releasing the site for development.

There is potential for a smaller release of land within the area identified as Little Chalfont - Area West of Lodge Lane, 2.10 and this is considered elsewhere in this report.

Appendix 15 Extracts from Buckinghamshire County Council Representations

Transport • Economy • Environment

Mark Kemp
Director Growth, Strategy & Highways

Buckinghamshire County Council

County Hall, Walton Street
Aylesbury, Buckinghamshire HP20 1UA

The Planning Policy Team
Chiltern District Council and
South Bucks District Council
King George V House
King George V Road
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Bucks
HP6 5AW

Tel: 01296 387092
www.buckscc.gov.uk

Date: 09 December 2016

Sent by email to:

planningpolicy@chiltern.gov.uk and ldf@southbucks.gov.uk

Dear Sir/ Madam

Consultation on Chiltern and South Bucks Local Plan Green Belt Preferred Options Consultation

Thank you for consulting Buckinghamshire County Council (BCC), we welcome the opportunity to comment on the Chiltern and South Bucks Local Plan Green Belt Preferred Options. BCC acknowledges the importance of a plan-led approach to managing housing growth and development across the Chiltern and South Bucks Districts as part of County wide strategic planning for the sustainable development of Buckinghamshire. The County Council has a statutory role for strategic planning as the County Highways Authority, County Transport Authority, County Flood Authority, County Education Authority and County Minerals and Waste Planning Authority and an obligation for joint working with the District Councils on their Local Plans. The County Council also fulfils other functions which advise on planning proposals such as the County Archaeology service which maintains the Historic Environment Record, the County Ecology service which has responsibility for monitoring and protecting the natural environment including the maintenance of the Bucks and Milton Keynes Environmental Records Centre and ecological resource of the County and the Public Rights of Way service which has responsibility for the managing and maintaining the County's Definitive Map.

BCC as a statutory Authority has an influencing role over County wide strategic planning matters with each of the Districts as part of the duty to co-operate (Localism Act 2011) and a Public Health obligation to safeguard social, economic and environmental wellbeing of the County; it is in this context that I have set out the County Council's response to the Green Belt Preferred Options presented by Chiltern and South Bucks District Councils.

Our representation to the Green Belt Preferred Options is set out below and structured in terms of general comments below, relating to the emerging spatial strategy for the joint Chiltern and South Bucks Local Plan; comments relating to the importance of the Green

Belt within Bucks and exceptional circumstances and comments on County Council service impacts anticipated from proposed development. More detailed comments on each of the specific Preferred Options proposals are listed in the attached Appendix A. Other appendices 1-16 contain more detail on specific matters referred to below.

Spatial strategy

As our comments at the Issues and Options stage clearly set out, BCC maintain that the spatial strategy for the plan area should focus on enabling development within the existing settlement boundaries to enable the provision of well-planned infrastructure to support sustainable development and conserve the County's distinctive, rural character. Such a strategy would also better support existing local services and facilities and safeguard the County's green belt and areas of AONB from inappropriate development. BCC maintain that there needs to be a County wide perspective on growth and housing provision in order to better enable sustainable outcomes that are well supported by appropriate infrastructure provision. We are not convinced that some of the preferred green belt options proposed within the plan area could achieve the level of critical mass required to generate the infrastructure needed to enable sustainable development. We would urge the Districts to collectively consider whether the housing proposed for some of the proposed extensions could be better planned elsewhere within the County, to enable more sustainable outcomes. Our concerns relate to the potential impact on County Council services and infrastructure provision as highlighted in the following sections.

Fundamentally, there needs to be a consideration of the proposed Green Belt options alongside the HELAA sites in order to consider the cumulative impact of development and the potential leverage from developer contributions for critical infrastructure investment. Given that intensity of growth pressures in this plan area, particularly within South Bucks from national infrastructure projects and construction impacts during the plan period there needs to be some consideration of phasing and deliverability of sites in order to mitigate unacceptable, cumulative impacts and sensibly plan for this part of the County.

At a strategic level, infrastructure provision is clearly an issue affecting housing growth in Buckinghamshire and a factor influencing the spatial strategy for housing and employment growth in the County. Developer contributions for critical, strategic infrastructure investment will need to be considered wholly or in part to meet additional infrastructure demands arising from additional housing needs. Where appropriate the County Council will seek to explore opportunities for integrated investment strategies for improving infrastructure provision, for example arising from Local Growth Funding (LGF) and / or mitigation measures arising from national infrastructure projects.

Green Belt

BCC value and respect the unique quality of the Buckinghamshire Green Belt and Chilterns Area of Outstanding Natural Beauty (AONB) and will continue to resist inappropriate development in the Green Belt and AONB. The preservation and maintenance of the Green Belt is a strategic objective of Buckinghamshire County Council. BCC would like to see the Green Belt protected in accordance with the National Planning Policy Framework and relevant guidance notes notwithstanding the need for a robust assessment of deliverable sites for housing and employment uses within the Local Plan area.

BCC recognise that the Buckinghamshire Green Belt is an integral part of the Metropolitan Green Belt. The Metropolitan Green Belt in this area greatly contributes to maintaining the distinctive character and identity of Buckinghamshire as well as preventing the outward

sprawl of London. This is stated at paragraph 1.4 in Chiltern District Council and South Bucks District Council Green Belt Assessment Part Two: Draft Report (October 2016).

BCC welcomes the removal of the proposed Green Belt options adjacent to Slough Borough. There was no clear evidence to show that sufficient land could not be found for housing within Slough and elsewhere within the Berkshire Strategic Housing Market area to meet Slough's housing need without taking land out of the Buckinghamshire Green Belt for that purpose. In any case, BCC would want to see Buckinghamshire's Green Belt retained for the reasons stated above.

The preferred options focus on the large Green Belt sites the Councils are proposing to take out of the Green Belt however the approach taken by CDC & SBDC in reviewing the Green Belt Boundary appears to be fragmented and give rise to confusion. For example, paragraph 1.7 in the Green Belt Part 2 Draft Report indicates that the Green Belt areas identified in the Preferred Options document for removal from the Green Belt were identified via the work in the 'Part One Green Belt Assessment as well as proposals made in, or in response to, the Reg 18 Issues and Options consultation and call for sites'. The Part One Assessment found that preferred options 3 (Land East of Hazlemere) was found to be performing well against the purposes of the Green Belt. This option was not identified as an option in the Reg18 consultation. Nevertheless, the area has been identified as a preferred option for removal from the Green Belt in the Preferred Options document. The identification of preferred option 3 appears to be at odds with the findings of the Green Belt Assessment Part One as well as the Reg18 consultation. The approach towards preferred option 3 appears to undermine the robustness of the process for identifying areas for removal from the Green Belt.

The Councils are also undertaking a detailed assessment of the existing Green Belt Boundaries around the existing settlement outside of the Green Belt which may also lead to smaller Green Belt sites coming out of the Green Belt as part of an inner Green Belt review. The Councils are also looking at whether to retain certain settlements washed over by the Green Belt. As such, there is no clear comprehensive and coherent picture of what is proposed by the Councils. This is unhelpful. The Councils should present a clear and comprehensive picture of proposed revisions to the Green Belt.

Exceptional circumstances for Green Belt boundary alterations

The NPPF encourages local authorities to work together to meet development requirements which cannot wholly be met within an area. At present, Chiltern (CDC) and South Bucks (SBDC) continue to work successfully with each other and the other local authorities within the housing market area (HMA). This is evident from the joint working arrangement between CDC and SBDC to prepare a joint local plan covering both districts, the cross boundary allocations between the CDC & SBDC plan area and the Wycombe plan area and the agreement between CDC, SBDC and Aylesbury Vale District Council to take unmet need from the CDC & SBDC's plan area.

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.

BCC consider that the preferred options proposed at Chesham (Preferred Option 1); Holmer Green (Preferred Option 2); Hazlemere (Preferred Option 3); Little Chalfont (Preferred Option 6) and Area South East of Chalfont St Peter (Preferred Option 8) 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. Detailed Green Belt considerations for each of these sites are set out later in this response, at the specific preferred options section.

Other Factors to be considered

In addition to the assessment of green belt land for development outlined above, the County Council has taken other factors influencing the suitability of land for development into consideration. The County Council has undertaken a high level assessment of impacts including transport connectivity; a RAG¹ risk assessment of potential highway impacts; education; ecology and archaeology impacts; the provision of Housing for Older people; Strategic Flood Risk Management; minerals and waste considerations; and Open Space provision – including the impact on Black Park Country Park. The density of housing is also a factor to be considered, outlined below.

Densities

CDC & SBDC appear to have used relatively generic density assumption for the preferred options. There is no clear reasoning for this approach. Inappropriate density assumptions can result in too much land being taken out of the Green Belt to meet development needs. The draft plan should provide clearer reasoning for the density assumptions for all allocations within settlements and areas proposed for removal from the Green Belt.

There are a number of green belt preferred options at Iver which should be considered collectively given the cumulative pressure they represent. Iver is already heavily congested and given its proximity to the M25 under considerable existing pressure from traffic impacts and construction impacts from major transport infrastructure, a situation which is likely to be exacerbated by the construction of HS2, Western Rail Link to Heathrow, M4 Smart Motorway upgrade and the proposed expansion of Heathrow. Given the challenges of mitigating existing impacts and bringing forward sustainable development at Iver, BCC considers that any development at Iver should be plan led and considered collectively for the sustainable development of Iver. The Councils should consider whether an area action plan or a master plan in the form of a supplementary planning document would better enable a more coherent approach towards planning for the Iver area over the plan period. This could also bring together the existing partnership work BCC is undertaking with Iver Parish Council and South Bucks District Council to address existing infrastructure pressures and appropriately mitigate future impacts.

Transport Connectivity

The emphasis of any development proposal should be on minimising the development's impacts on the highway network whilst considering current and future sustainable transport. Although this suggests that areas in and around the main settlements should be favoured over other areas (e.g. small, remote and/or rural settlements, where transport networks and general connectivity is generally less well developed). There needs to be a good appraisal of the impacts that proposed development may create. Paradoxically, towns are also the areas where there is often most congestion and as highlighted above,

¹ Red Amber Green

Rights of way

The footpaths across this site would seem to have the potential to provide several convenient connections onto Whielden Street and Piggott's Orchard. There are two footpaths linking south for recreational opportunities: Footpath AMS/21/4 connects across the bypass down the cutting, while Footpath AMS/23/2 connects across a bridge. AMS/23A/1, AMS/23B/1 and AMS/21/4 link onto Whielden Street. Rights of way therefore can provide good connections to local amenities in Old Amersham, the hospital and options for local recreation to the south. The site also benefits from being close to the proposed route of the National Cycleway (see plan above under 'Area South of London Road West'). Though the draft land use plan indicates two footpaths within the area proposed for housing, the routes could be retained along the footway network.

Detailed ecology matters

Extensive area, clearly well used local amenity. A small part is within a BOA. Few records of wildlife are present but that may be due to a lack of survey. There may be semi-improved grasslands present. Limited use of the area for development may create opportunities for biodiversity enhancements. Sensitivity: moderate/ low.

Preferred Option 6: South East of Little Chalfont

Green Belt matters

The part 1 assessment found that general area 35 (now preferred options 6) had a 'medium' score overall. Taking this area out of the Green Belt even though it has a 'medium' score is inappropriate, because the area was found to perform well against the purposes of the Green Belt. Developing this area would encroach on the countryside.

The assessment proforma for this option in the part 2 assessment, appendix 5, volume 2 states that developing in the area of this preferred option is likely to affect the setting of the Chilterns AONB as the site is adjacent to the AONB. Developing between 850 and 1,000 dwellings at 30 to 35 dwellings per hectare within the developable parts of this preferred option is likely to have an impact on the AONB. Any part of the preferred option that is not developed is likely to come under development pressure which likely to increase the impact on the setting of the AONB.

The part 2 assessment, appendix 5, volume 2 states that this preferred option could be removed from the Green Belt without harming the wider Green Belt. The southern boundary of the preferred option appears to be a combination of a Long Walk, the rear gardens of the properties on the northern side of Long Walk and wooded areas. These features do not form a clear permanent and defensible boundary. There is currently a row of development along the southern side of Long Walk. Taking this preferred option out of the Green Belt would inevitably mean that the row of development along the southern side of Long Walk would also need to be taken out of the Green Belt and increase development pressure on the area to the south of the preferred option which is bound by Lodge Lane, Burtons Lane and Long Walk. Also note that Long Walk appears to be a private road. Paragraph 4.4.13 in the part 1 assessment states that private roads lack durability.

The proposed defensible boundary to the east of the preferred option also appears to be weak as sections of Lodge Lane are narrow single track road. This will give rise to

development pressures within the remaining Green Belt on the eastern side of Lodge lane. For example, development proposals coming forward adjacent to the eastern boundary of the proposed new Green Belt boundary along Lodge Lane would sight the example of the row of homes adjacent to the proposed southern boundary of this preferred option.

Highways matters

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. Will require Transport Assessment to demonstrate impact is acceptable and access by all modes can be achieved. Suitable access and visibility would be required. The A413 Aylesbury to Denham has known congestion issues and was formally identified as a Primary Congestion Management Corridor in in Local Transport Plan 3 (LTP3), and therefore the impact on this route would need to be carefully considered and addressed. A development of this scale would also have a significant impact on the strategic route of the A404 which would also need careful consideration and possible mitigation. In particular, the cumulative impact on the junction of Burton’s Lane with the A404, and Coke’s Lane with the A404 will be a key consideration.

IMPACT	RAG
<ul style="list-style-type: none"> • Preferred option located on eastern edge of Little Chalfont south of the railway with proposed residential capacity of 1000 homes. • Served by bus services <ul style="list-style-type: none"> ○ 336 (hourly) – High Wycombe - Beaconsfield - Rickmansworth - Watford • Served by rail <ul style="list-style-type: none"> ○ London Underground – offers 5 services per hour into London. ○ Chiltern Rail – offers two services per hour • Key road impact (AM Peak) <ul style="list-style-type: none"> ○ A404 Amersham Road – The key impact is on Cokes Lane at the junction with White Lion Road / Chalfont Street Road. The impact at this preferred option is deemed to be as a result of the roundabout and traffic on the A404. It is felt that mitigation may improve access in this area. 	<p>Amber</p>

Rights of way

There are no public rights of way within the site, but a footpath (LCF/11/1) through New Hanging Wood and a bridleway past Lodge Farm (CSG/43/1) provide recreational opportunities to Chenies for walkers and cyclists from the site. The area also benefits from having a regional cycling route on the south-western boundary (‘The Milton Route’) following Burton’s Lane into Little Chalfont. The Chiltern Heritage Cycle Trail (promoted by Chiltern District Council) and Chilterns Cycleway (promoted by the Chilterns AONB) also pass just to the north of the A404 and consideration should be given to providing improvements to these routes via CIL.

The southern boundary of the site is with ‘Long Walk’. This route probably carries pedestrian rights, though these have not yet been ‘recorded’. The county council are processing a claim for a footpath between Lodge Lane and Burton’s Lane. Loudhams Wood Lane remains private at present, so could not be utilised for pedestrian or cycling access.

A railway bridge still exists south of No 9 and 11 Oakington Avenue (see Appendix 6). A compulsory purchase of these properties or agreement to use Network Rail land would be necessary to create a walking route into Amersham Road, leading to a very short distance to the train station for commuters. Otherwise, routes alongside existing highways would need to be considered.

Detailed ecology matters

This includes significant areas of ancient woodland and deciduous woodlands as well as a traditional orchard. It lies adjacent to a railway corridor. It is not within a BOA and sensitive development could provide opportunities for enhancement of habitats and wildlife corridors.

Sensitivity: moderate.

Strategic Flood Management

This preferred option has a clear surface water flow route from the west to the north east shown in purple on the plan below. A flood risk assessment will need to be completed for the flood risk area.





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