



Planning Application – PL/21/4632/OA

**Full approval of access proposals and demolitions,
plus outline approval for land between Burtons Lane
and Lodge Lane in Little Chalfont**

Joint Objection

Submitted by:

Little Chalfont Parish Council

and

Little Chalfont Community Association

19 January 2022

Statement

The Little Chalfont Parish Council and Little Chalfont Community Association work together on major planning applications for the village, involving the community views in formulating a response that is submitted jointly.

The Little Chalfont Community Association is involved in many community projects, and has a membership approaching 700 households, plus businesses and voluntary organisations.

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**APPLICATION PL/21/4632/OA, LAND BETWEEN BURTONS LANE AND LODGE LANE
LITTLE CHALFONT**

**OBJECTION BY LITTLE CHALFONT PARISH COUNCIL AND LITTLE CHALFONT
COMMUNITY ASSOCIATION.**

KEY POINTS

- Little Chalfont Parish Council and Little Chalfont Community Association (LCCA) object strongly. Our objection is supported by three professional studies, at appendices: A Independent Highways Assessment; B Landscape Briefing Note; and C Review of Submitted Ecological Information. We shall submit separately material on Reserved Matters. (Paras 1- 2)
- **Green Belt**
 - The applicant cites a withdrawn draft local plan in support of development in the Green Belt, but this now carries no weight. The applicant also cites the Green Belt Assessment in the evidence base for the withdrawn draft local plan, but we have shown evidence that the Assessment was flawed and unsound in its treatment of the area containing the application site. (Paras 3-10)
 - Contrary to the impression given in some of the applicant's publicity, the site is not the same as the one proposed for development in the withdrawn local plan. The local plan site included an existing industrial area. The application site does not, so is purer Green Belt. (Para 4)
 - The proposals contravene Green Belt policies in the Adopted Local Plan, the Core Strategy and the National Planning Policy Framework (NPPF). The claimed *very special circumstances* do not outweigh the harm to the Green Belt from this proposed inappropriate development. (Paras 11-31)
 - The application site performs strongly in NPPF Green Belt purposes (b) to prevent coalescence (with Chorleywood) and (c) to safeguard the countryside from encroachment. (Paras 32-38)
 - Green Belt alongside a settlement is not weaker than other Green Belt. (Para 37)
- **AONB AND AoSC**
 - The development would harm the setting of the Chilterns Area of Outstanding Natural Beauty (AONB), which is adjacent to the site at its boundary with Lodge Lane. (Paras 39-41)
 - The site is sandwiched between the AONB to its east and an Area of Special Character (AoSC) to its west, and provides a positive setting to both. (Para 42)
- **Access and Transport**
 - The professional report at Appendix A challenges the applicant's assertions on vehicular access and sustainable travel, provides evidence

of omissions and unjustified claims in the applicant's documentation, and recommends refusal on highways grounds. (Para 43). A separate independent study is noted at Para 44.

- The applicant's claim that an access strategy was agreed with the former county council, in relation to the withdrawn Chiltern and South Bucks draft plan, is not based on published evidence, and should be regarded as of no material significance. (Paras 45-46)
- The vehicle access proposals are unsustainable, unacceptable, and should cause refusal of the application. Harm caused by use of Lodge Lane, Church Grove East and Burtons Lane would be excessive, to those lanes, to the chalk dry valley, to the setting of the AONB, and to surrounding narrow lanes. (Paras 47-74)
- The former Bucks County Council was opposed to use of Lodge Lane as a main entrance to a development on this land. (Para 54)
- The narrow gap under the railway bridge in Lodge Lane would require a priority operating system (confirmed by the above professional report). This would be a further major obstacle to use of Lodge Lane as the main access road, and a source of air pollution from waiting vehicles. (Paras 55-56)
- Danger to the hikers and other pedestrians who use Lodge Lane would be greater than the Environmental Statement suggests. (Para 58)
- Without a direct pedestrian access to Little Chalfont centre, the development would not be sustainable. The pedestrian/cycle route proposed across a new railway bridge, to meet Oakington Avenue, would not be fit for its purpose. It would bring hazards to pedestrians, including schoolchildren. (Paras 59-62)
- Bus stops on the A404 could not be relocated near the proposed new Oakington Avenue exit for road safety reasons, some already identified in appeal decisions. (Paras 63-64)
- It is claimed that traffic flow would be restricted between the western and eastern parts of the site. The exact use of the link road between the two parts, and the capacity to enforce any restrictions, is an access issue which should be decided with the outline application. (Paras 65-68)
- Likely heavy car use by residents on the proposed development would conflict with climate change policy. (Para 69)
- Little Chalfont has no bypass. A Strategic Inter-Urban Route (A404) runs through the village centre. The development would create more traffic on the A404, worsening existing congestion, parking problems and danger to pedestrians including many children who walk through the centre to attend a large high school, crossing a busy road where there is no zebra crossing. (Paras 70-72)
- We conclude, as does the report at Appendix A, that this application should be refused on highways grounds. (paras 73-74)

- **Harm to natural environment, and pollution**
 - The professional report at Appendix B points out important omissions and failings in the applicant's Landscape Visual Impact Study (LVIA) and adds evidence to our case against inappropriate development in the Green Belt. (Paras 76-77)
 - The many high buildings proposed would worsen urbanisation in the rural environment. (Paras 20 and 80)
 - In a letter to the community the applicants stated that there would be no housing in the chalk dry valley. However, the Design and Access Statement shows that there would be extensive housing in the dry valley, and roads on the valley floor, spoiling a rare and valued Chiltern landscape feature which extends over most of the site. (Paras 81-83)
 - Buffers proposed for ancient woodland do not meet Woodland Trust standards and are inadequate. (Paras 84-85)
- **Ecology**
 - The professional report at Appendix C shows that the ecological information provided by the applicant is inadequate. The net gain in biodiversity proclaimed by the applicant appears to be incorrect, by some margin, and it appears that the proposals would result in a negative biodiversity outcome. (Para 86)
 - There would be possible overload of the existing sewage works at Maple Cross leading to further pollution of local rivers. (Para 87)
- **Infrastructure**
 - The development would harm Little Chalfont's physical and social infrastructure, which has already absorbed two large estates totalling 300 homes in recent years. It would overwhelm local services, including GPs, through an abrupt increase of at least 17% in housing. (Paras 88-90)
- **Affordable housing**
 - There is always a shortage, but Little Chalfont is relatively well supplied with housing association properties (over 450). The applicant offers affordable housing, but has not completed any legal agreement with a mechanism to secure this. (Para 91)
- **Brownfield sites**
 - 4 brownfield sites are registered now, with 2 more "possibles" in future, including a big one. (Paras 92-93)
- **Demolition**
 - The proposed demolition of certain buildings should not be permitted if the access proposals, or outline permission, are refused. (Paras 994-95)
- **Application lacks detail**
 - The application contains insufficient firm proposals. Too much scope is left for different proposals by a future owner. (Para 96)

INTRODUCTION

1. Little Chalfont Parish Council and Little Chalfont Community Association (LCCA) object strongly to this application.

Supporting documents

2. Our case below is supported by the following appendices.
 - Appendix A: an Independent Highways Assessment by Paul Mew Associates.
 - Appendix B: a Landscape Briefing Note by Michelle Bolger Expert Landscape Consultancy.
 - Appendix C: a Review of Submitted Ecological Information by Bioscan (UK).
 - Appendix D: a map showing the location of the chalk dry valley (previously appended to our response to the Regulation 19 consultation on the, since withdrawn, draft Chiltern and South Bucks Local Plan).

We shall submit a separate document with our views on reserved matters as soon as possible.

GREEN BELT AND LOCAL PLANNING POLICY

3. Harm to the Green Belt is a major objection to this application.
4. Section 7 of the Planning Statement repeatedly refers to the application site (e.g. in 7.35 and 7.36) as if it is the same as the Green Belt site proposed for development in Policy SP BP6 in the withdrawn Chiltern and South Bucks (CSB) draft local plan. The applicant's "message to the community" letter of 30 December 2021 makes the same assertion. This is not so. The SP BP6 site was about a third bigger than the application site and contained the Honours Yard industrial area. The application site does not include Honours Yard and is, therefore, much purer Green Belt, containing less than 1% built form.
5. The applicant places emphasis and weight on the site being put forward as part of policy SP BP6 in the above plan. However, it is important that at Secretary of State level the soundness of that plan was challenged and it was withdrawn.
6. The Buckinghamshire Council case officer's report on a recent application to develop a Green Belt site elsewhere in Little Chalfont, PL/20/3239/OA, stated: *Much of the Applicant's submitted Planning Statement relies on the provisions of the Chiltern and South Bucks Local Plan 2036. However, this only had an emerging status, had not been to Examination and was withdrawn by the Council in November 2020. As such the former unadopted and emerging Local Plan carries no weight.* The case officer's report of November 2021 on application PL/21/3151/OA for a development in the Green Belt at Beaconsfield, similar in size to the application site, noted that: *...the Draft Chiltern and South Bucks Local*

Plan 2036 was never examined as it was withdrawn. Therefore, the policies contained within it hold no material weight in planning decision-making.

7. In section 7.18 of the Planning Statement it is claimed that the evidence base for the withdrawn plan remains a material consideration in assessment of the site. In our Regulation 19 submission of 16 August 2019 on that plan we drew attention to two serious flaws in the evidence base relating to the Green Belt Assessment of the site.

8. First, we showed that the assessments made in that evidence of site SP BP6's contribution to the Green Belt purposes defined in the National Planning Policy Framework (NPPF) were inaccurately low, because they did not follow the methodology prescribed for the study. The same flaw was independently demonstrated by Michelle Bolger Expert Landscape Consultancy in their Site Appraisal (section 6.2.4-5) appended to our above submission. Both analyses showed that, had the methodology been followed, General Area 35 (later SP BP6) would not have been proposed for removal from the Green Belt.

9. Secondly, we referred to paragraphs 137 and 123 of the NPPF. Those sections place new emphasis on the need to protect Green Belt land and to review densities to make optimal use of the potential of each non-Green Belt site. There was also a perception in the NPPF that some brownfield sites may have been overlooked. Our submission stated that these changes to the NPPF occurred after the Council had completed its selection of sites and preferred options to meet the Objectively Assessed Need (OAN). However, there was no evidence that the Council carried out any review of those preferred options against the changes in the NPPF. That failure to reflect on the changes was, in our opinion a serious flaw in the evidence base. A review of the NPPF changes would have led to a greater contribution to the OAN from other sites and made it possible for site SP BP6 to remain in the Green Belt.

10. Buckinghamshire Council has indicated that it will not produce a new draft local plan covering Chiltern and South Bucks until about 2024, after government policy has been more clearly established following debate initiated by the white paper 'Planning for the Future'.

Adopted local plan policies: Harm to the Green Belt and to the surroundings

11. In the absence of a new adopted local plan, the local policies relevant to the present application are those saved from the Adopted Chiltern District Local Plan of 1997, principally Policies GC1 and GB2, also Policy GB30 (which refers specifically to areas of Green Belt not within the Chilterns Area of Outstanding Natural Beauty), and those in the Adopted Core Strategy for Chiltern District of November 2011, principally Policy CS1, the 'Spatial Strategy'.

General Criteria for Development.

12. Policy GC1 in the Adopted Local Plan sets out that development needs to be designed to a high standard that complies with the other policies in the Plan. Design is not just about appearance but also its relationship to its surroundings. Important criteria can be summarised as follows.

- Scale of development. Development should be in scale with its surroundings, relating well in terms of overall dimensions to all features of the townscape and landscape.
- Height. New buildings and structures should generally conform with the height of adjoining buildings and structures.
- Relationship of Development to its site. Development should relate well to the characteristics of the site on which it is to be located.

13. Our concern is that the siting, not only of residential development, but also of residential development on this scale in this location, does not relate well to its surroundings, and is inappropriate and insensitive in the landscape, the Green Belt location, and in the setting of the AONB and an Area of Special Character (AoSC).

Saved Policy GB2 in the Adopted Chiltern District Local Plan of 1997 states:

Most development in the Green Belt is inappropriate and there is a general presumption against such development. Development which is not inappropriate is set out in this Policy. Planning permission will be refused for inappropriate development in the Green Belt, but may be given for the categories of development set out in clauses (a) to (f) below.

- a) New buildings which are reasonably required for agricultural or forestry purposes. "Agriculture" has the meaning given in section 336 (1) of the Town and Country Planning Act 1990 (as amended):*
- b) New buildings to provide essential facilities for (i) outdoor sport and (ii) outdoor recreation; for (iii) cemeteries and for (iv) other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it.*
- c) The limited extension, alteration or replacement of existing dwellings in accordance with Policies GB6, GB7, GB12, GB13 and GB15 in this Local Plan.*
- d) Limited infilling within the areas identified in Policies GB4 and GB5 in accordance with Policies GB4, GB5, GB22A and GB23 in this Local Plan.*
- e) Change of use of existing permanent and substantial buildings, in accordance with Policies GB10, GB11, GB22A and GB29.*
- f) Engineering and other operations and the making of material changes in the use of land (as distinct from buildings) which maintain openness and do not conflict with the purposes of including land in the Green Belt. The granting of planning permission is subject to other Policies in this Local plan being complied with.*

The granting of planning permission is subject to other Policies in this Local plan being complied with."

Saved Policy GB30 states:

Where development would be acceptable in accordance with other Policies in this chapter, it will be permitted if it would be well integrated into its rural setting and so conserve the scenic beauty and amenity of the landscape in the locality of the development. In addition, where considered appropriate and practicable by the Council,

the development should provide for the improvement of degraded landscape within the application site. This Policy applies to all land within the Green Belt which is not included within the Chilterns Area of Outstanding Natural Beauty, the Area of Attractive Landscape, Locally Important Landscape Areas and Parks and Gardens of Special Historic Interest

14. Objection under GB2 and GB30: harm to the Green Belt. The proposal in the application does not fall within any of the exceptions (a) to (f) in Adopted Local Plan Policy GB2 above. The proposal would introduce built form onto the greater part of the site, with a significant proportion of the site being occupied by buildings, roads and parking areas. The proposal would completely alter views across the site, resulting in the loss of the open and rural character of the site to the detriment of the character and amenity of the area. The proposal would not conserve the scenic beauty and amenity of the landscape in the locality of the development, especially that beauty and amenity in the AONB which begins at Lodge Lane, immediately adjacent to the application site. The development would be highly visible from homes in the adjacent residential roads: Burtons Lane, Loudhams Wood Lane, Village Way, Oakington Avenue and The Retreat; also from Lodge Lane and from public footpath LCF/11/1 through New Hanging Wood (AONB) opposite the proposed site entrance. The proposal is therefore contrary to policies GB2 and GB30 of the Adopted Chiltern District Local Plan of 1997.

Policy CS1, The Spatial Strategy, in the Adopted Core Strategy for Chiltern District, states:

The spatial strategy for Chiltern District aims to protect the Chilterns Area of Outstanding Natural Beauty and Green Belt by focusing new development between 2006 and 2026 on land within existing settlements not covered by those designations. The built-up areas of the most accessible of these settlements: Chesham; Amersham/Amersham-on-the-Hill; Chalfont St Peter and Little Chalfont will be the main focus for development. Limited development will take place in other villages excluded from the Green Belt, namely Chalfont St Giles; Great Missenden; Prestwood and Heath End; Holmer Green; Penn and Knotty Green; Chesham Bois and Seer Green. Some redevelopment and infilling is planned for identified developed sites in the Green Belt. Very little development is intended elsewhere.

Core Strategy note 7.4 on the Spatial Strategy states:

88% of Chiltern District (and all of its countryside) lies within the Metropolitan Green Belt. National planning policy on Green Belts aims to prevent urban sprawl by keeping land permanently open and establishes a presumption against inappropriate development on designated land. The Coalition Government has stressed the continuing importance of protecting Green Belt. The development needs of the District can be met without encroaching into undeveloped parts of the Green Belt and there are no exceptional reasons for departing from national policy. Accordingly, it is neither

necessary nor appropriate to consider large-scale building on undeveloped countryside in the Green Belt.

15. **Objection under CS1: harm to the Green Belt.** The proposal is contrary to Policy CS1, the Spatial Strategy, of the Adopted Core Strategy for Chiltern District (November 2011), which decided to focus new development on land within existing settlements which is neither Green Belt nor AONB.

Built form: harm to the Green Belt

16. The Applicant's Planning Statement seeks to argue that the site includes built form and existing development. By our reckoning the existing built form covers less than 1% of the land area of the site and therefore has no significant impact on the openness of the site. In comparison to the built form proposed in the scheme the current built form is negligible. In spatial terms the proposed development introduces a high level of built form where currently there is none.

17. The applicant stresses that a certain proportion of the development will remain open space and compares this with the proportion of proposed built form. We do not consider this comparison to be relevant. The comparison which should be made is between the proportion of open space now, and that which will remain after the development.

18. The proposed development would introduce built development into what is currently open countryside in the Green Belt. It would create a feeling of over-urbanisation in what is currently a large expanse of countryside contributing to the landscape.

19. There is no doubt that the proposal is for inappropriate development in the Green Belt. Therefore, it would fall to be considered under NPPF paragraphs 147-150 (see below).

Building Heights

20. The building heights parameter plan at 5.3 of the Design and Access Statement shows about fifteen large buildings of three, "up to three", or "up to three and a half" storeys for flats and mixed use purposes, all at the northern side of the site. This is excessive for this boundary of the urban area. Such high buildings are out of keeping with the nearby residential roads in Little Chalfont, which are characterised by bungalows and two-storey detached houses.

GREEN BELT AND NATIONAL PLANNING POLICY

Objections under the National Planning Policy Framework (NPPF), July 2021.

Green Belt boundaries

21. No existing local plan or draft local plan makes provision for changing Green Belt boundaries in Chiltern District under the procedure in NPPF paragraph 140. Therefore, the proposal to build in the Green Belt is not justifiable under paragraph 140. The Green Belt's extent cannot be altered through the approval of a planning application.

Inappropriate development

22. NPPF paragraphs 147 and 148 state:

147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

23. Paragraphs 149 and 150 then list types of building and other activities which are exceptions, not considered inappropriate, to the above policy. The applicant's proposal does not match any of these exceptions, as the Planning Statement acknowledges at section 7.5.

No 'very special circumstances'

24. The applicant's case under the NPPF must thus rest on whether 'very special circumstances' can be identified to justify inappropriate development on the site.

25. We are not aware of any comprehensive, up-to-date, report on the housing requirement in Buckinghamshire, of the kind which will be needed for preparation of the next local plan. We understand from paragraph 6.21 of the case officer's report on application PL/21/3151/OA that the Council is in the process of updating the 5 year housing supply position statement in the light of the adoption of the Vale of Aylesbury Local Plan, and to incorporate the most up to date housing delivery data. The case officer continues: "*As such it is considered that this dilutes the weight can be attributed to the delivery of housing as a benefit of the scheme. It is considered that housing delivery is a benefit that can be attributed moderate weight.*" We assume that this statement would also apply to the present application. There is no evidence that the local need for new housing in Little Chalfont is exceptional enough to amount to very special circumstances. While we acknowledge a general need for affordable housing, Little Chalfont is relatively well supplied with low-cost housing through housing associations. (See below under Affordable Housing).

26. Furthermore, it is not the case that generic factors, such as housing need, can be applied as exceptional circumstances without consideration of the circumstances at individual sites. Paragraph 51 of Mr Justice Hay's judgment of 24 March 2015 in the Calverton case shows that the nature and extent of harm to a particular Green Belt site should be 'grappled with'.

27. Very Special Circumstances will not exist unless the potential harm to the Green Belt (by virtue of the development being inappropriate) and any other harm (landscape, highways and biodiversity) is clearly outweighed by other considerations.

28. Housing need does not justify development in the Green Belt in and of itself. The applicant accepts that the proposed development is, by definition, inappropriate development in the Green Belt. We consider the harm to the openness of the Green Belt *significant*, not *moderate to limited*. We consider the impact on the Green Belt purposes significantly worse than 'moderate'.

29. The majority of the benefits of the proposal are in terms of delivering housing and those benefits do not outweigh the harm to the Green Belt and the other harm to the locality as set out within this submission.

30. When considering this application, the local planning authority should ensure that substantial weight is given to any harm to the Green Belt. That harm is identified in the paragraphs above. The harm identified is that which introduces a scheme of residential development into the Green Belt. The scheme does not preserve the purposes of maintaining Green Belt land. The harm will be both in terms of spatial and visual harm to the openness of the Green Belt. It does not satisfy any of the exceptions to development in the Green Belt set out in the NPPF. The harm to the Green Belt and its openness is significant.

31. The appended professional studies set out the harm in relation to landscape, highways and ecology. The harm which would be caused by this development is not only in Green Belt terms.

Green Belt Purposes

32. It is stated in the Applicant's planning statement that the overall contribution of the site to the Green Belt purposes is moderate. We do not accept that view and consider that the contribution the site makes to the Green Belt is being 'played down' and under-valued in the application.

33. Paragraph 137 of the NPPF of July 2021 sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of Green Belts are their openness and their permanence. The proposed site consists almost entirely of open Green Belt, containing less than 1% built form.

34. The application site meets strongly the Green Belt purposes in paragraph 138 of the NPPF as follows.

35. Purpose (b) *"To prevent neighbouring towns merging into one another"*. The site constitutes an important part of the Green Belt separating Little Chalfont from Chorleywood. There is no housing directly between the site and Chorleywood except for Lodge Farm. It is also important to note that the housing to the south of the site on Long Walk and Lodge Lane is designated on the Adopted Local Plan Policies Map as 'Rows of Dwellings in the Green Belt'. The limitations on development imposed by that designation mean that the area south of the site also fulfils a role under Purpose (b). Outline application 20/0898/OUT to Three Rivers District Council for a development at Green Street, west of Chorleywood, already threatens to urbanise further Green Belt between Chorleywood and Little Chalfont, and the proposal in PL/21/4632/OA would worsen this. Therefore, Buckinghamshire Council should take account of Three Rivers application 20/0898/OUT in considering PL/21/4632/OA in relation to NPPF paragraph 138 Purpose (b).

36. Purpose (c) *"To assist in safeguarding the countryside from encroachment"*. The site performs strongly because it contains less than 1% built form, is closely linked to the wider Green Belt, and provides openness and tranquillity close to the centre of Little Chalfont. The proposal would destroy the site's role under purpose (c) and would damage the setting of the wider Green Belt.

37. The NPPF does not distinguish between different categories of Green Belt but treats all Green Belt as the same. It would be false to suggest that Green Belt adjacent to a settlement is somehow less valuable than other Green Belt. On the contrary, it provides a firm boundary to residential development and is a particular amenity for the many who have views across it, as do residents of Burtons Lane, Loudhams Wood Lane, Village Way, Oakington Avenue and The Retreat, as well as walkers in Lodge Lane and local Public Rights of Way (PROW). Moreover, the logical consequence of such a false idea is that all Green Belt would be gradually but inevitably eroded away.

38. The applicant over-emphasises the existing built form on the site and downplays the character of the site and its performance against the purposes of including land within the Green Belt. The whole application site should remain Green Belt without further development.

CHILTERNES AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

39. The site is in the setting of the AONB, which begins immediately adjacent to the site at its boundary with Lodge Lane. Development of the site would:

- Harm both the setting of the AONB and views from the AONB by removing the buffer of open land that separates the AONB from Little Chalfont, and which provides an appropriate setting for the AONB through the continuity of landscape character across the AONB boundary into the application site. See the attached professional report at Appendix B.
- Buildings proposed on the site, especially those three storeys high, would damage the view from the AONB. Contrary to the claim in sections 7.45 to 7.49 of the Planning Statement, the estate and its tall buildings would be highly visible from AONB land near the site entrance in Lodge Lane, including the popular PROW path LCF/11/1 through New Hanging Wood towards Chenies.
- Harm the character of Lodge Lane, a quiet, rural lane characteristic of the Chilterns AONB, by widening, by the lane's close proximity to the development, also by noise and pollution from increased traffic from the larger, busier, eastern part of the site, which it is proposed would include the retirement village, the care home, and possibly a school.
- Result in the loss of an attractive, rural landscape which contributes positively to the setting of Little Chalfont, the AONB and the wider countryside.

40. Policy LSQ1 in the Adopted Local Plan set out clearly that the primary objective is to conserve and enhance the natural beauty of the landscape. Conservation and enhancement of the AONB is key, and, where development is not consistent with these objectives, permission should be refused unless there are very exceptional circumstances that outweigh those landscape objectives.

41. The criteria set out in policy LSQ1 point directly to what needs to be assessed as to whether a development meets the test of conservation and enhancement. These include the size, scale, siting and design of the development in relation to existing screening vegetation and landscape features with particular reference to screening effects. The high buildings proposed in the application would be

visible from the AONB above existing screening. Most of the development would be visible from Lodge Lane and the nearby PROW in the AONB.

AREA OF SPECIAL CHARACTER (AoSC)

42. The site is sandwiched between the AONB to its east and an Area of Special Character (Burtons Lane to Doggetts Wood Lane) to its west. The AoSC appears on the Adopted Local Plan Policies Map as an 'Established Residential Area of Special Character' under Saved Policy H4. The characteristics of the application site are consistent with those found within the AONB, and supportive of both the AONB and the AoSC, providing a positive setting for both.

ACCESS AND TRANSPORT

Proposed access roads

43. We ask the LPA to consider the Independent Highways Assessment report by Paul Mew and Associates at Appendix A, which draws attention to serious omissions and incorrect statements in the applicant's Transport Statement and Framework Travel Plan, as well as to the inadequacy of the Framework Construction Traffic Management Plan which is for Reserved Matters. The report provides overwhelming evidence to challenge the applicant's assertions that '*Safe and suitable vehicular access to the proposed development will be provided from Lodge Lane and Burtons Lane*' and that '*the site is accessible by sustainable modes of travel including foot, cycle and public transport*'. The report's conclusions are as follows.

5.2 Assessment of the Transport Statement submitted in support of the application concludes that the site has limited access to sustainable transport with a poor levels of local bus services, pedestrian links that are not lit during hours of darkness and rail services that are at an extended walk distance. In addition, analysis of personal injury accident data has not considered the most recent 5 year period and has not fully assessed pedestrian and cyclist injury accidents.

5.3 Access to the site at both proposed locations are likely to be unviable as they have sightline issues. Lodge Lane and Burtons Lane are also problematic due to narrow road widths and questionable benefits of road widening. In addition, required Road Safety Auditing has not been carried out / reported.

5.4 The impact of anticipated increases in vehicular activity cannot be fully assessed as questions remain over trip generation forecasts, the assignment / distribution of these to the local road network, and the over estimation of the use of sustainable modes of transport. A series of thorough / robust Travel Plans would be required across all proposed land uses, not just residential, to achieve a reduction in car based trips.

5.5 The Framework Construction Traffic Management Plan should contain a greater level of detail for the proposed scheme such than an informed decision can be taken by highways / planning officers. This should include an assessment of the impact of construction traffic on the village centre which is already subject

to congestion and parking issues. The provision of detailed construction information should not wholly be deferred to post consent condition discharge.

5.6 In conclusion, the proposed development should not be permitted on highways grounds.

44. We also draw the LPA's attention to a highly relevant study, covering, in particular, Lodge Lane and Church Grove East, submitted independently as an objection by a local resident, Mr Kamran Haider, who is a professional transport consultant.
45. It is claimed in 4.3 of the applicant's Transport Statement that *"A safe and suitable access strategy for the site was agreed during pre-planning discussions with Buckinghamshire County Council (BCC) for a larger potential development than that proposed"*. This appears to relate to discussions mentioned in a letter of 21 February 2020 from CBRE to the Inspectors appointed to conduct the Examination in Public of the draft CSB draft local plan, discussions said to have taken place in July 2018 and June 2019. Prolonged attempts by the parish council to obtain details of these discussions from Buckinghamshire Council were refused. Our understanding from the replies received was that only preliminary discussions had taken place, and that detailed design drawings had not been provided to the Highways Authority to enable them to test the position. A subsequent request for the documents relating to these meetings, made by a local resident under the Environmental Information Regulations, was refused on grounds of confidentiality.
46. In our view, since the above discussions were held with a council since abolished, on a draft plan subsequently withdrawn, and since no minutes, report or other details of the meetings have ever been published, the applicant's claim that an access strategy was agreed should be regarded as of no material planning significance whatsoever.
47. Policy TR2 of the Adopted Local Plan sets out clear principles if planning permission is to be granted. Those can be summarised as:
 - Satisfactory access onto the existing highway network. Where possible access should be taken from the lowest category road. In general access will not be permitted onto the primary road network.
 - The Highway Network in the vicinity of the development should have the capacity to accept the additional flow of traffic generated by the development without significantly exacerbating any existing overloading or other traffic-related problems.
 - Traffic of excessive volume, size or weight will not be accepted on unsuitable roads, including rural lanes or in conservation areas or residential areas.
 - Standards of road safety for all users should be at a minimum maintained and, where appropriate, improved.

Burttons Lane

48. An entrance to the site where proposed, on the floor of a highly visible part of the chalk dry valley, a valued Chiltern landscape feature, would be unacceptable on environmental grounds. It is also questionable whether an access could be placed on the narrow floor of the dry valley with adequate braking distances (particularly in icy conditions) on the steep slopes at both sides.

49. The following local traffic problems would be caused by an entrance in Burttons Lane. To access the M25 and Rickmansworth, residents of the western part of the development would use the very narrow section of Burttons Lane east of the site, towards Lodge Lane (for the A404) or Chorleywood, or they would take Burttons Lane to the A404 in the village centre, adding to the heavy congestion which already affects the junctions there. To access the A413, often regarded as the best route to London, rather than travel three sides of a square via the village centre and Cokes Lane, drivers would use the very narrow eastern section of Burttons Lane and then the single-track residential Roughwood Lane – which is completely unsuitable for such traffic.

Lodge Lane and Church Grove East.

50. Lodge Lane, and Church Grove East, which connects Lodge Lane to the A404, are the borders of the AONB and form an important part of its setting. Both are narrow, with limited vision in places, and have no footways. Church Grove West, which provides a longer alternative route from Lodge Lane to the A404, also has a very narrow section without footways.

51. The proposed widening of Lodge Lane would change its quiet rural nature, as would the additional traffic from its use as the access to the larger part of the site, with the associated noise and pollution. No traffic survey appears to have been carried out to assist in measuring these effects.

52. The proposed widening of Church Grove East would presumably take place on the eastern (AONB) side of road to avoid harm to the houses on the western side and verges.

53. The Chilterns Conservation Board has described Lodge Lane as *“a very attractive sunken lane, characteristic of the Chilterns AONB woodland and unsuitable for additional traffic or upgrade.”* During preparation of the former Chiltern and South Bucks Local Plan, the Chilterns Conservation Board expressed concern that *“.....development would add traffic and air pollution to the AONB at Lodge Lane (and wider)”*.

54. The former Buckinghamshire County Council said, in response to the Green Belt Preferred Options Consultation of Oct 2016, that development on the land between Lodge Lane and Burttons Lane was *“unlikely to be supported by the Highway Authority unless a suitable access can be achieved from Burttons Lane”*. Because of the present applicant’s claim that traffic flow between the western and eastern parts of the development would be restricted to *“bus and sustainable transport”* (Transport Statement 4.8) and emergency vehicles, no exit to Burttons Lane is intended serve the larger eastern part of the development. We would expect the

Highway Authority of Buckinghamshire Council to maintain the objection of its predecessor to the use of Lodge Lane as a primary entrance.

55. The railway bridge in Lodge Lane between the A404 and the site entrance has a clearance of only 3.96m, so tall vehicles and machinery could not pass.

56. The bridge already acts as a traffic pinch point, which would become more serious if the carriageway nearby is widened to take more traffic. The carriageway under the bridge is 6.1m wide. A 0.5m median strip is usually required adjacent to a vertical surface alongside a carriageway. This would reduce the width under the bridge to 5.1m, which, as the professional report at Appendix A confirms, would require some form of priority operating system with vehicles from one direction being required to give way to vehicles approaching from the other direction. This would cause substantial delay and inconvenience at busy times, increased air pollution from waiting vehicles (dispersing slowly in this sheltered dip), and would be a further major drawback to use of Lodge Lane as the main access.

57. In addition, long steep slopes in Lodge Lane both north and south of the proposed site entrance can be impassable in frozen conditions and could prevent vehicle access, including emergency vehicles.

Increased risk to hikers and pedestrians using Lodge Lane

58. The Environmental Statement (ES) describes Lodge Lane as a road without footways used by pedestrians, and rightly expects serious adverse effects from much increased traffic, including increased fear and intimidation for pedestrians. However, this would be worse than suggested, because the ES wrongly assumes that desired access to the PROW network is mainly near, or south of, the site entrance in Lodge Lane (so could be accessed from the village across the proposed railway bridge and through the development). It is true that there is a popular PROW access there (LCF/11/1), but the most popular PROWs are in the Chess Valley off Stoney Lane, meaning that the number of walkers who now head north up Lodge Lane and Church Grove East to reach those PROWs would be increased by walkers from the new development. Pedestrian use of those lanes would increase even more if the bus stops on the A404 remained where they are now (see below). The proposed pedestrian path across the railway would do nothing to mitigate these flows, which would face substantial deterioration in pedestrian safety.

Pedestrian footway between the site and the village centre

59. Without a direct pedestrian access to the village centre the proposed development would not be sustainable. Pedestrian use of Lodge Lane to reach the village centre from the site is not viable (too long, no footway or lighting, long steep hill), and a route from the Burtons Lane exit in the west would be too long to serve the larger eastern part of the site as its primary pedestrian access. Consequently, it is proposed that the primary pedestrian access would be via a new railway bridge and Oakington Avenue. For the road safety reasons given below it is unlikely that bus-stops could be sited near this exit, which would greatly reduce its convenience for pedestrians.

60. Busy use of the proposed railway bridge pedestrian/cycle route at peak times would create danger and inconvenience for the many schoolchildren and their parents, sometimes with prams or toddlers, who use the narrow A404 pavements and/or the present zebra crossing (proposed to become a toucan crossing) to access the primary school in Oakington Avenue from the centre and other parts of the village. The mingling of cyclists and pedestrians on footways near the toucan crossing could also cause danger.

61. Furthermore, if a school was provided on the proposed development, the Oakington Avenue exit from the path across the railway bridge would become the unauthorised drop-off point for children not resident on the development. There is no space for such parking on Oakington Avenue, and the drop-off traffic would create additional congestion, with hazard for children walking to the existing school and poorer local air quality caused by exhaust fumes.

62. For the above reasons the proposed railway bridge path to Oakington Avenue would not be fit for its purpose. Therefore, given the problems of Lodge Lane, Church Grove and Burtons Lane outlined above, there is no viable means of direct pedestrian access between the proposed site and the village centre. In our view this renders the proposed development unsustainable in modern planning conditions, where the limitation of car use is most important.

Access to bus-stops, consequences for Lodge Lane and Church Grove East

63. Neither Lodge Lane nor Church Grove East has any pedestrian footway. Church Grove West lacks a footway on its narrowest section. The applicant proposes moving the present bus-stops on the A404 to positions close to the western end of Oakington Avenue, to be convenient for pedestrians walking to and from the proposed new footway across the railway. However, it does not appear that a stop for westbound buses could be sited west of the Oakington Avenue junction without severe risk to road safety – see the Appeals Inspector’s reports on two refused applications for a domestic vehicle entrance in that section of the A 404 (application CH/2017/2197/FA, appeal ref APP/X0415/W/18/3203607; and application PL/20/0689/FA, appeal ref: APP/X0415/D/20/3253104). A new westbound bus stop placed east of the Oakington Avenue junction would be on a sharply curving part of the A404 with limited vision, creating a hazard. It would also be necessary to construct an access path, and the bus-stop itself, on an old and popular ‘green space’ tended by local residents, who value it as recreational space and a visual amenity. Bushes and trees on that space would have to be destroyed to provide pedestrian access to the bus-stop. Therefore, it appears unlikely that any bus-stop could be placed in a position to make the footway across the railway convenient for access to buses. We are surprised that, before making the application, the applicant did not consult the bus operators and the highway safety authority to establish whether new bus stop positions could be agreed.

64. If the bus-stops had to remain where they are now, at the junction of Church Grove West with the A404, it would be necessary to provide pedestrian footways on Lodge Lane and Church Grove, and street lighting on Lodge Lane, meaning that the

widening would need to be much greater and do more environmental harm. The long distance from the site entrance and the steep hill would also be a strong deterrent to much use for access to bus stops.

Link Road

65. The shape of the proposed development site includes a narrow pinch point alongside the ancient Stonydean Wood. Within the pinch point a link road is shown in the drawings. The proposal accepts, presumably for reasons of landscape and ancient woodland protection, that it should not be possible for vehicles, except, it is claimed, “bus and sustainable transport” and emergency vehicles, to cross between the eastern and western parts of the site on the link road. There is insufficient detail provided in the application on exactly what and when vehicles would be allowed to use the link road between the site’s proposed access points, and no indication of how any restricted use would be enforced. If the proposed restriction could be enforced, this would mean that traffic from the western part would have only one entrance/exit, via Burtons Lane, and traffic from the much larger eastern part would have only one entrance/exit, via Lodge Lane.

66. The professional report at Appendix A foresees (section 2.30) that *“It is inevitable that any access control (gate / barrier / bollard) will be breached and that through vehicular traffic will result.”*

67. There is no room at this pinch point for a 50m buffer zone, which The Woodland Trust advises should be maintained both in the construction phase and for after-uses that generate significant disturbance. With only the proposed 30m buffer zone, it is likely that both the development of, and any excessive use of, the link road would cause significant and permanent damage to Stonydean Wood. This would be contrary to NPPF paragraph 180 c) which requires refusal of developments which would result in the loss or deterioration of irreplaceable ancient woodland.

68. In the absence of evidence of appropriate protection of Stonydean Wood alone, the request for formal approval of the proposed vehicular access(es) to the site should be refused.

Car use and sustainability

69. There is no evidence that residents at the site would make significant use of a pedestrian and cycle access to the village outside peak commuter hours, even if a viable one could be created. Residents now living at the same distance from the centre tend to use their cars when shopping in the village. See also paragraphs 2.7, 2.18 and 2.45 to 2.48 of the professional report at Appendix A. The NPPF (paragraph 8 c)) identifies an overarching environmental objective which includes *“...mitigating and adapting to climate change, including moving to a low carbon economy.”* The high car use we would expect by residents on the proposed site would not serve that objective.

Traffic congestion and danger to pedestrians in the village centre

70. Traffic on the A404 would be increased by the proposed development. Little Chalfont is unique among the Chiltern District “main settlements for growth” identified in Core Strategy Policy CS2 (Amersham, Chesham, Chalfont St Peter and Little Chalfont) in having no bypass round its centre. Therefore, increased congestion on the A404, a Strategic Inter-Urban Route which passes through the village centre and shopping area, would reduce the amenity of the centre more directly than such main road congestion would do in other local communities. This would include worsening of the already chronic queuing problem on the A404 for entry to the village’s main shopping precinct on Chenies Parade.

71. Congestion on the village centre section of the A404 will increase further when the development of 309 homes is opened at Newland Park, off the B4442 (planning permission CH/2014/1964/FA), the residents of which are expected to use Chalfont and Latimer Station for commuting at Transport for London prices rather than pay the higher prices on Chiltern Rail from Gerrards Cross. The resulting new vehicle flow from the Cokes Lane/A404 junction will meet traffic emerging onto the A404 from Burtons Lane, 30 metres further east on the way to the station. There will inevitably be yet more congestion on the A404 from other developments in the area, such as those proposed at Chorleywood.

72. The applicant has reviewed highway capacity and has, therefore, focussed on car movements. No thought appears to have been given to the additional conflicts in the village centre between motorised vehicles and vulnerable road users - pedestrians and cyclists. No mitigation has been proposed to assist pedestrians. Increased congestion in the village centre would create significant additional danger, for example, to the many pupils who walk from the railway station, or from homes eastwards, to Dr Challoner’s High School for Girls (1140 pupils) crossing Cokes Lane at its junction with the A404 where there is no zebra crossing.

ACCESS AND TRANSPORT: Conclusion

73. The absence of adequate, sustainable vehicle and pedestrian access to the larger eastern part of the site, as demonstrated above, should, alone, lead to refusal of the application. The above objections to an access in Burtons Lane, and to the proposed pedestrian/cycle route across the railway, strengthen the case for refusal on access grounds. As explained above, the use of the link road between the two parts of the site should also be determined as an access issue.

74. **As the attached professional report concludes, the proposed development should be refused on highways grounds.**

CONSERVATION OF THE NATURAL ENVIRONMENT AND ECOLOGY

75. The proposal would cause substantial damage to the natural environment.

Landscape

76. We ask the LPA to consider the report at Appendix B by Michelle Bolger Expert Landscape Consultancy. The report provides strong additional evidence for our objection to inappropriate development in the Green Belt, and identifies

important failings in the application, including omissions in the applicant's Landscape Visual Impact Assessment (LVIA) which:-

- fails to recognise the Burtons Lane - Doggetts Wood Lane Area of Special Character (AoSC), the presence of which would worsen the impact of the development;
- fails to assess whether the development would achieve the Vision or the Guidelines set by the Landscape Assessment 2011 for Landscape Capacity Assessment (LCA) 18.3 (it would not);
- fails to identify the true extent of the chalk dry valley, which extends over nearly the whole site;
- fails to describe the impact on Lodge Lane.

77. The report concludes as follows.

44. The development would adversely impact landscape and visual receptors identified as being sensitive to change and would not achieve the Landscape Guidelines for LCA 18.3. The overall effect upon the local landscape, which includes the AONB and the Burtons Lane to Doggetts Wood Lane AoSC and their settings, would be moderate/major adverse, and significant. The proposals overall would not protect nor enhance a valued landscape contrary to paragraph 174 of the NPPF.

45. The development would result in moderate adverse, and significant effects on the visual amenity of people using Lodge Lane and Burtons Lane and people using a public right of way within the AONB.

46. The development would also have an adverse spatial and visual impact on the openness of the Green Belt and conflict with one of the purposes of including land within the Green Belt contrary to paragraphs 137 and 138 of the NPPF.

78. The proposal fails to address adequately the issues in NPPF Section 15 (Conserving and Enhancing the Natural Environment), including those in paragraph 174 a) and b), under both of which it is important to take account of the typical Chiltern character and beauty of the site, chalk dry valley, ancient woodland and deeply rural landscape providing priority habitat in the setting of the AONB.

79. As shown at Appendix B (paragraph 22), the site is a 'valued landscape' in respect of NPPF paragraph 174 a). The site's valued characteristics will not be retained, let alone enhanced, if they are surrounded by development. It is wrong to claim that green infrastructure improvements and the limitation of damage by landscape buffers would fully compensate for the removal of large areas of unspoilt, open land which currently acts as an important Green Corridor. The overall effect within this area of land must be negative.

80. As explained under 'Building Heights' above, the proposed buildings three storeys high would radically urbanise the appearance of the site, and undermine attempts, much vaunted in the applicant's publicity, to preserve a "green landscape and environment."

The Chalk Dry Valley

81. In their “message to the community” letter of 30 December the applicants stated *“We understand the importance of the dry valley. That is why there will be no housing in it.”* This claim is incorrect, as the proposal is to build extensively on the slopes of the dry valley.

82. Both the photo at <https://houseprices.io/lab/lidar/map?ref=SU99569721> and the map at Appendix D, show that the dry valley extends over nearly the whole site. The Parameter Plan on page 90 of the Design and Access Statement shows clearly that it is proposed to build housing extensively on the northern slope of the dry valley in both the eastern and western parts of the site, that a road entrance will occupy the floor of the valley at the western end, and that the link road between the two parts of the development will be on the valley floor. Even if other parts of the narrow valley floor are left open as proposed, the result will not leave anything recognisable as a rural chalk dry valley, which is such a valued feature of the Chiltern countryside and rare in the world.

83. While the Design and Access Statement states that the setting of the dry valley is to be retained and enhanced, this is not possible at the same time as the replacement of fields within the valley with development.

Ancient Woodland

84. A 30m buffer, inadequate in our view, is proposed to protect the site’s ancient woodland. The Woodland Trust recommends that, *“as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.”*

85. No evidence has been produced that a smaller buffer would suffice, particularly to protect the ancient woodland at Stonydean Wood from the road proposed to link the two sections of the site, both during construction and if, thereafter, the use of that link road cannot be strictly limited to public service vehicles.

Ecology

86. Here we can do no better than quote the conclusions of the professional study by Bioscan (UK) Ltd, at Appendix C.

4.1.1 As noted in the introduction of this report, the above serves as a ‘high level’ review of the submitted ecological information; and once the relevant information has been provided then the ecology reports can be subject to further detailed examination. However, it should be noted that based on the information provided, a full and robust assessment of the submitted ecological documents cannot be made.

4.1.2 Currently, it is considered that due to the paucity of detailed ecological information, and with many of the ecological surveys not appearing to meet industry-standard guidelines/guidance (as outlined above), that this has implications on the

veracity of the impact assessment conclusions offered by the Applicant to the extent that it would be unsafe to apportion the conclusions made to any weight in planning determination.

4.1.3 It should be noted that the presence of scarce and declining 'Priority' species and habitats is material to the discharge of the biodiversity duty imposed on public authorities by the NERC Act 2006, and therefore the omissions outlined above are significant for the robustness of the determination process in a legal sense. There are also significant information gaps in relation to European protected species which fall short of the expectations enshrined in incumbent planning practice guidance and further go to the matter of legal robustness. These shortfalls are particularly acute in respect of bats. It is consequently recommended that the LPA request more detailed ecological information before a planning decision is made.

4.1.4 The Bioscan review of the Biodiversity Net Gain report highlights that the net gain proclaimed by the Applicant appears to be incorrect, by some margin, and on the contrary, it appears that the proposals would result in a negative situation (i.e. a considerable loss of biodiversity, quantified as approaching -40%). Such a loss would be contrary to the Environment Act 2021, and local and national policy. In order to allow for these figures to be examined further, the Applicant should supply the raw spreadsheet calculations to allow for full transparency and public scrutiny, and before any determination of the application is considered.

4.1.5 In conclusion, the ecological reports submitted may not accurately represent the ecological interest present on the application site and it is advised that extreme caution is applied in using it to inform decision making. The safeguards and mitigation proposals offered in the report are founded on an incomplete understanding and/or conveyance of the baseline position and cannot therefore be relied upon by decision makers as a means to avoid significant net loss of biodiversity. This is in contradiction to national and local planning policy. It is recommended that clarity be sought from the Applicant, including justification for deviations from industry standard survey methodologies, to enable a more robust impact assessment to be conducted.

SEWAGE

87. The proposed development would increase usage of the Maple Cross Sewage Treatment Works and increase the risk of foul water discharges into local rivers. We understand that the Maple Cross STW had 83 such spills over 1110 hours in 2020. The LPA is asked to consider how close to capacity this STW is running, and take account of this important issue in consideration of the outline application.

HARM TO AMENITY THROUGH DISPROPORTIONATE GROWTH

88. Little Chalfont, now about 2800 households, is by far the smallest of the four settlements listed in policy CS2 of the Chiltern Core Strategy of 2011 as "major settlements for growth". Nevertheless, since that time Little Chalfont has had to absorb, in addition to normal windfall growth, about 300 new dwellings on two large new estates at Turners Field/Old Mill Place and Harvard Grange, completed in 2017.

These put further strain on already overloaded infrastructure and contributed to the traffic and parking chaos which often prevails in the village centre.

89. The development now proposed of up to 480 households plus a care home and other staffed facilities is disproportionate to the present population size and infrastructure of Little Chalfont, so would damage amenity for all residents. The proposed growth would mean at least a 17% increase in housing stock. The social consequences of such an abrupt and disproportionate step-change in urbanisation would conflict with policy statements in the Chiltern Core Strategy including the “Key Spatial Issue” *How to maintain and improve the high quality environment of our towns, villages and countryside.*

90. A retirement village and care home, as proposed, would need to be accompanied by a significant increase in medical care from the local GP services. It appears unlikely that Little Chalfont surgery could expand any further, or St Giles surgery in Chalfont St Giles. The two practices in Chorleywood are under Hertfordshire Health authority and therefore would not take on the significant increase in workload required across the border in Buckinghamshire. With the current shortage of GPs it seems very unlikely that a new GP could be found to set up in practice on or near the application site.

AFFORDABLE HOUSING

91. Although there is always a shortage of affordable housing, Little Chalfont is relatively well provided with housing association properties. We are aware of at least 464 - the total of the numbers supplied to us by housing associations operating in the village, although one association with properties at Turners Field or Old Mill Place has not replied to our enquiry. The two new estates referred to above both brought new affordable housing. We note that although the applicant proposes 40% affordable housing, no suitable and completed legal agreement, with a mechanism to secure the provision of this affordable housing, is included in the application.

BROWNFIELD SITES

92. We acknowledge that there is pressure nationally to find space for more housing, and that the council may lack a five-year land supply for that purpose. In this context we draw attention to the following. There are four sites in Little Chalfont on the Council’s current brownfield register. The parish council is considering listing two more in response to the latest call for brownfield sites, as follows:

- The site in Chalfont Station Road where planning permission CH/2017/2090/FA was given for office units and ten flats.
- It is known that GE Healthcare intends to dispose of its 8.9 hectare industrial site at The Grove Centre, Little Chalfont, which is being decommissioned. We understand that decommissioning is likely to be complete by 2030, when the land could become available. Some may become available earlier. The site is close to the centre of Little Chalfont and has direct access onto the A404. Although now designated for employment use, with the agreement of Buckinghamshire Council and GE Healthcare the land could be made available for housing early in the period of the council’s forthcoming new local plan.

93. It is our view that no more large housing estates can be built in Little Chalfont without severe damage to local amenity and already overloaded infrastructure. However, if such development has to occur, we would prefer it to be on a brownfield site such as the Grove Centre. It would be better to await this brownfield opportunity than to permit, now, the destruction of a piece of beautiful and almost virgin Green Belt in Little Chalfont.

DEMOLITION

94. The Planning Statement states that “Some of the buildings on site are now unusable, inefficient and in a poor state of repair.” This description does not apply to:

- the two bungalows in Oakington Avenue, a sought-after location close to the popular and over-subscribed Little Chalfont Primary School; nor
- to the Homestead Farm residential building, a unique, albeit not listed, arts and craft period building which is very visible along all of Burtons Lane.

95. If either the detailed consent to the proposed access points in Burtons Lane and Lodge Lane, or the requested outline planning permission, is refused, the demolition of these buildings, and the consequent reduction in bat roosting possibilities, would not be justified and should also be refused.

RISK OF CHANGE TO THE PROPOSALS IN THE APPLICATION

96. As we have made clear above, we object to the access details proposed for formal approval. While we understand that the remainder of the outline planning application will not have the detail of a final application, in our view insufficient firm detail is given of the key development parameters. Many aspects are prefaced with the words “illustrative” and “indicative”, meaning that very little would be fixed apart from the proposed access routes. In the unfortunate event that the application should be permitted, wording on page 13 of the Design and Access Statement suggests that some conditions may be imposed at the discretion of the council specifying what, if any, of the features “illustrated” should be adopted inside the development. However, this approach leaves open the possibility that, if the site were to be sold on with the planning permission now sought, a future owner might seek to change in a final application any feature not previously specified by the council. Therefore proposals might be put forward significantly different from those the public have been led to expect. **On these grounds alone the application should be refused.**

CONCLUSION

We consider that our objections, summarised in the Key Points at the head of this submission and then set out in detail, show that this application should be refused, to protect the Green Belt, to prevent two completely unsuitable roads being used for access, and to prevent other harm to the environment, amenity, and infrastructure of our village and its surroundings. We ask Buckinghamshire Council to refuse the application.

19 January 2022