



**11 SEPTEMBER 2022**

**SUBMISSION BY:**

**LITTLE CHALFONT PARISH COUNCIL  
AND  
LITTLE CHALFONT COMMUNITY ASSOCIATION,**

**APP/X0415/W/22/3303868**

**LAND BETWEEN LODGE LANE AND BURTONS LANE, LITTLE CHALFONT**

**INTRODUCTION**

- A. What follows updates and supplements, but does not repeat or (with the exception only of paragraphs 11–14 below) replace the material in our joint objection submitted to Buckinghamshire Council on 19 January 2022, our further comments submitted on 10 March about ecology, and our further comments submitted on 8 April about Highways and Access. Those three submissions appear at Appendix A to the Case Officer’s report, provided to the Buckinghamshire Council Strategic Sites Committee. We trust that all three, and the professional reports on Highways, Landscape, and Ecology appended to them, will be taken into account by the Inspector.
- B. Our objections were summarised in the Key Points at the head of our main submission of 19 January 2022.
- C. We draw the Inspector’s attention particularly to our objections to the evidence base for the withdrawn Chiltern and South Bucks Local Plan, set out in their updated form at paragraphs 18-23 below. These are objections which we do not expect to be made by the LPA.

**Attachment**

We have not attached the documents mentioned in paragraph A above to this statement, as the Inspector will already have received them. However, we now attach an earlier document to support our objections to the evidence base for the withdrawn Chiltern and South Bucks Local Plan. This is the professional Site Appraisal prepared by Michelle Bolger Expert Landscape Consultancy, that was appended to our Regulation 19 submission of August 2019 objecting to the withdrawn plan.

## **CONTENTS**

Our supplementary comments below are under the following headings.

### **ACCESS AND HIGHWAYS**

- Reasons for our special concern about this, and response to the LPA’s decision notice (paragraphs 1-3 below).
- Challenge to a claim by the appellant about Stage One Road Safety Audits (4-5).
- Cycling and horse-riding on the proposed access roads (6-7)
- Threat to Roughwood Lane, which we respectfully invite the Inspector to visit (8-10).
- A modified text of our argument about the ‘pinch point’ within the site (11-14).
- Recent reduction of bus services near the site (15-17).

### **GREEN BELT AND LANDSCAPE**

- Details of our objections to the evidence base for the withdrawn Chiltern and South Bucks Local Plan (18-23)

### **PROPOSED DEVELOPMENT AT GREEN STREET CHORLEYWOOD**

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### **RESERVED MATTERS**

- Our comments, included for the first time. (25-59)

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- We oppose their approval through planning conditions (60)

### **POTENTIAL CONDITIONS**

- Our main concerns for planning conditions, if the appeal should be allowed (61-63)

### **COMMENTS ON THE APPELLANT’S STATEMENT OF CASE**

- Challenges to various points (64)

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## ACCESS AND HIGHWAYS

1. Although the application is for outline permission, it includes *“Matters to be considered at this stage: Burtons Lane and Lodge Lane Access.”* In other words, a final decision is requested now on the use of Lodge Lane and Burtons Lane for access to the proposed development. This is a major point of concern to our residents, who (as many of their 1100 individually written letters of objection show) share our view that both roads are wholly unsuitable both on highways and on environmental grounds.
2. We invite the Inspector to look closely at both the highways and environmental issues in weighing up whether these roads could provide satisfactory access. Our detailed objections on both grounds are in paragraphs 43-74 of our submission of 19 January 2022. Our objections are well supported by the Review of Landscape and Visual Impacts by the Michelle Bolger Expert Landscape Consultancy, and the Independent Highways Assessment by Paul Mew Associates, attached to that submission. See especially paras 8, 26-28, 33 and 45, about Lodge Lane and Burtons Lane in the Review by Michelle Bolger.
3. The landscape harm to the two roads is briefly covered in paragraph 2 of the LPA’s Decision Notice, and is well explained in the consultee letter of 15 February 2022 from the LPA’s s Landscape Architect. However, the LPA’s Highways objection (paragraph 4 of the Decision Notice) is limited to the insufficiency of information provided by the applicant. We hold that the highways objections, as set out in our submission of 19 January 2022 and the study by Paul Mew Associates, are already clear. They describe in detail the unacceptable harm, in planning and highway terms, which would occur to Lodge Lane and Burtons Lane. In addition to that material, we submit the following updated information.

### **Stage One Road Safety Audit**

4. In a “Technical Note : Response to Buckinghamshire Highways” dated 16 March 2022 the appellant states in section 3.2: *“With regards a Stage One Road Safety Audit, the requirements of HDMG have been followed which states that a Stage One and Stage Two Safety Audit is required at detailed design stage. The detailed design will be undertaken when the Reserved Matters application is submitted as the current application is in outline only. This requirement can be addressed by a planning condition.”*
5. The above statement is inaccurate. Stage One safety audits are normally carried out at the concept stage of a project. This is particularly important as the applicant asks for approval of access via Lodge Lane and Burtons Lane at this stage. We are pleased that the Case Officer’s report states in paragraph 11.9 that *“additional information is required in the form of Stage One Safety Audits”* and we are disappointed that there is no specific reference to this requirement in paragraph 4 of the Decision Notice. Given, especially, the harm identified in the study by Paul Mew Associates (Appendix A to our submission of 19 January 2022), Safety Audits should be carried out before the appeal is decided. To allow the appeal without the proper audits having been carried out would permit the development to proceed without addressing this highway concern.

### **Cycling and horse riding on the proposed access roads**

6. Regarding road safety, the Inspector should be aware that many cyclists use Burtons Lane, which is part of the Chiltern Cycling Heritage Trail. Horse riders, including those from local farms, use Burtons Lane, Lodge Lane and Roughwood Lane (see below).
7. Burtons Lane is used by cyclists to connect National Cycle Route 57 (at Chesham) and 6 (at Rickmansworth), riding along the cycle path from Chesham to Little Chalfont, then down Burtons Lane to Rickmansworth using quiet country lanes. This route provides a link in the Chilterns AONB National Cycle Route: Oxford – Chesham – Rickmansworth – Windsor – Woodley – Wallingford – Oxford.

### **Roughwood Lane**

8. We understand that, unless strategic modelling now being undertaken by the appellant reveals the problem, the LPA do not intend to mention in their case the harm that would affect Roughwood Lane (paragraph 49 of our 19 January submission).
9. Traffic from both proposed accesses from the site, heading for London or for the M40, would often take Roughwood Lane as a shortcut to the A 413, to avoid driving the longer route through the village centre. The lane has ‘Single Track’ signs at each end. It is a long, narrow, twisting, rural residential road, with poor vision, where the entrances to drives are already too much used as passing spaces in the absence of sufficient lay-bys. We respectfully invite the Inspector to observe this when carrying out the site visit that will take place as part of the appeal process.
10. The additional traffic from the proposed development would harm the amenity of residents and the safety of pedestrians, cyclists and riders in Roughwood Lane, as well as creating increased risks to drivers. If strategic modelling of the site and surrounding areas had been carried out earlier by the appellant (it was not; see paragraph 11.8 of the Case Officer’s report) this problem should already have been identified.

### **Pinch point**

11. Our concerns about the proposed link between the two parts of the site were set out in paragraphs 65-68 of our submission of 19 January 2022, but for greater clarity we now modify that passage in our submission as follows.
12. The shape of the proposed development site includes a narrow pinch point alongside the ancient woodland called Stonydean Wood. This might have resulted in two entirely separate sites for proposed development with the western part having its own entrance/exit, via Burtons Lane, and the much larger eastern part having its entrance/exit, via Lodge Lane. In fact, the proposals include a link road across the pinch point with the claimed intention that its use should be restricted, so that it should not be possible for vehicles, other than “bus and sustainable transport” and emergency vehicles, to use the link road (presumably to protect the ancient Stonydean Wood). However, the application provided only vague and inconsistent detail on what and when vehicles would be allowed to use the link road, and provided no information about how any restricted use could, or would, be enforced. Such details should have been made clear now, so that this does not become an issue later, with restrictions which the local or highway authority cannot control or enforce.

13. Our professional advice (see section 2.30 of Appendix A to our objection of 19 January 2022) is that “It is inevitable that any access control (gate / barrier / bollard) will be breached and that through vehicular traffic will result.”
14. Furthermore, there is no room at this pinch point for a 50m buffer zone, which The Woodland Trust advises should be maintained as a minimum for the inevitable regular cross-site use that must generate significant disturbance to the ancient woodland and through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. No such supporting evidence has been provided and so, with a proposed buffer zone of only 30m, it is likely that both the development of, and the inevitable heavy use of, the link road would cause significant permanent and ongoing damage to the irreplaceable ancient woodland of 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.

#### **Reduced bus services near the site**

15. Since the LPA’s decision on this application there has been a major reduction of the bus service on the A404, which we consider requires attention. The reduced service will affect the accessibility and sustainability of the site, and increase reliance on private vehicles. The details are as follows.
16. Paragraph 3.14 of the applicant’s Travel Plan referred to the hourly Monday to Saturday 103 bus service available along the A404 (Amersham Road). Although not within the 400 metres maximum walking distance recommended by the Institute of Highways and Transportation (paragraph 3.1 of the Travel Plan), this, and the much less frequent 336 service (4 buses a day on weekdays, 3 on Saturdays) along the same road, were the closest bus services to the site, the next closest being much further away, at Chalfont and Latimer Station.
17. The 103 service was closed by the provider (Carousel), in July 2022. That leaves the much less frequent service by the 336 (Arriva) Amersham – Watford as the only bus service now operating along Amersham Road. The loss of the 103 will reduce public transport access to the site, and will reduce the convenience of the proposed walking/cycle route from the site across the railway to Oakington Avenue and the A 404, where the appellant proposed that new bus-stops should be positioned near that junction.

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#### **GREEN BELT AND LANDSCAPE**

18. The Case Officer’s report states in paragraph 5.10 that *“While the Chiltern and South Bucks Local Plan has been withdrawn and carries no weight, the evidence base can be considered material where relevant.”* The appellant makes much of this in his case.
19. We ask the Inspector to note the following three objections to the evidence base for the withdrawn plan.

##### **Change to NPPF ignored by Chiltern and South Bucks Councils in Green Belt Assessment process**

20. First, in our Regulation 19 Submission of August 2019 objecting to the (since withdrawn) Chiltern and South Bucks Local Plan, 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 housing 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 had 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 could 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.

### **Methodology of the Green Belt Assessment not observed**

21. Secondly, in our Regulation 19 submission we pointed out that the methodology declared for the Green Belt Assessment had not been observed in respect of site SP BP6, and that if it had been observed the site would not have been selected for possible development. The same flaw was independently demonstrated by Michelle Bolger Expert Landscape Consultancy in Chapter 6 of their Site Appraisal (attached) that was appended to our Regulation 19 submission.
22. The details of our objection, as supplied in our Regulation 19 submission in the context of NPPF Green Belt Purpose (c), are as follows. ("the councils" refers to the former Chiltern and South Bucks District Councils)

"The site performs strongly under purpose (c) (safeguarding the countryside from encroachment) because it contains well under 5% built form, is closely linked to the wider Green Belt, and projects openness and tranquillity close to the centre of Little Chalfont. Moreover, the assessment of performance in the evidence documents conflicts with the stated methodology, the proper application of which would have produced a result which would have eliminated the SP BP6 site from further consideration for release from the Green Belt. We challenge the score of only 3 awarded in the pro-forma at **Appendix 5 Vol 2 to Draft Green Belt Assessment 2 (GBA2)** for this site. Details are as follows.

- a) Section 4.4.25 of the **Buckinghamshire Green Belt Assessment Part 1 Methodology and Assessment of General Areas** (Referred to below as **GBA1**) records that when the General Areas identified at Stage 1 of the assessment were reviewed, for Green Belt Purpose 3, a score of 4 was awarded where an Area contained less than 10% built form and **and/or** possessed a strong unspoilt rural character.
- b) The councils' own analysis (**Green Belt Assessment Part 1 (January 2016) - Parcel Proformas**) of GB Parcel 35 (the "General Area 35") site which is now the Little Chalfont SP BP6 site, confirms that the built form within the site is less than 5%. In fact, it is only about 2.4% (Source: Magic Maps). In this case, the first requirement (that the site contains less than 10% built form) is satisfied and therefore, the site should score at least 4.
- c) According to Section 3.10 of the **Draft Green Belt Assessment Part 2 (GBA2)**, land "scoring strongly (4 or 5) against the criteria for one or more of the Green Belt Purposes was judged to be meeting the Purposes strongly overall" and

Section 3.11 confirms that **GBA2** adopted the same approach as the Part One Assessment, **GBA1**. In Section 4.4.4 of the **GBA1**, land "judged to be meeting the [NPPF] purposes strongly overall" was "deemed unsuitable for further consideration in Part 2 of the Green Belt Assessment".

- d) After the very late change in the methodology for **GBA1** (see g) below) an exception to the scoring methodology was allowed in section 4.4.4 where a possible subdivision of sites was identified. The scoring of this Little Chalfont site was clouded because it was only part of the site taken forward as a strategic option site for consideration in the **GBA2**. The site taken forward encompassed the western parts of the large General Area 29 and all of General Area 35. While it was considered that the combined site had "the potential to score differently" and "may score weakly", no score was awarded to the combined site. However, the **GBA2** concluded that the initially proposed extension of General Area 35 was ruled out in the **Green Belt Development Options Appraisal** because of "significant harm to the AONB" and "exceptional circumstances are not demonstrated" to include the western parts of General Area 29.
- e) With the exclusion of the western part of General Area 29 from the strategic option site, the Preferred Option 6 site (now SP BP6) is the same as the original General Area 35, which under the published methodology (specifically the table in 4.4.25 of **GBA1**) warrants a score of at least 4, and should therefore have been excluded from further consideration for development.
- f) The councils have sought to justify the score of 3 for Green Belt Purpose 3 on the grounds that the initial score for the site's low percentage of built form was appropriately adjusted on the basis of 'qualitative assessments of character', referred to in **GBA1** 4.4.25. It is claimed that the factors which influenced that assessment of character of General Area 35 as "semi-rural" were the position of the site on the edge of Little Chalfont, with development on 3 sides, the fact that it includes a former golf course and some built form. However, the assessment appears to have excluded acknowledgement of the site's substantial openness, tranquillity, dry valley, ancient woodlands, traditional orchards and pre-18th century field enclosures – all features identified by the Chilterns Conservation Board. The councils then ignore the site's built form of less than 5% and subjectively contend that a score of 3 is correct for a site with less than 10% built form and with a largely rural character. We dispute this justification: it is flawed because it is in direct conflict with the scoring table at the end of 4.4.25 which, if the councils' claimed justification were accepted, would be rendered unexplained and redundant.
- g) Although it is not directly relevant to our contention that the councils' justification is flawed, it is also noted that the methodology used by the councils to justify the score was significantly amended by the councils just four days before the close of the Initial Regulation 18 Consultation, and that under the previously published methodology, a site with as much as 20-30% built form and a semi-rural character would have scored 3, the score the councils decided to be appropriate for the Little Chalfont site with less than 5% built form."

## Landscape Capacity Assessment

23. The third of our three objections to the evidence base, mentioned in paragraph 19 above, concerns the Landscape Capacity Assessment for Green Belt Development Options (LCA). The Michelle Bolger Expert Landscape Consultancy, in paragraph 5.3.4 of their Site Appraisal (attached), found the following faults in the LCA.
- “The methodology is overly complex making it difficult to follow.
  - The criteria used to assess landscape value appear to be based on quality and rarity only. These criteria for value are too narrow and fail to account for other aspects of landscape such as recreation and conservation interest, which can add value.
  - The value assessment is weighted heavily towards designations and does not allow for high landscape value for valued landscapes outside the designated areas (such as the eastern dry valley in which BP6 is located).
  - International designations such as World Heritage Sites and Special Areas of Conservation are cited as examples of ‘high’ value. This threshold is too high. This approach has distorted the assessment of value, such that National Parks and AONBs are considered to have only medium/high value.”

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## **PROPOSED DEVELOPMENT AT GREEN STREET, CHORLEYWOOD REF 20/0882/OUT**

24. This application, for up to 800 homes on a Green Belt site between Little Chalfont and Chorleywood, will be decided by Three Rivers District Council, Hertfordshire, at a future date not yet stated. However, a preliminary debate was held by the council on 11 August 2022. If permitted, the project would have a significant impact on coalescence between the two settlements (NPPF Green Belt purpose (b)) and would greatly increase the volume of traffic on the A404 through the centre and shopping area of Little Chalfont, which is already seriously congested. Little Chalfont Parish Council has lodged an objection. The Inspector is asked to take account of this project and its local effects in making his decision on the appeal.

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## **RESERVED MATTERS**

25. We did not comment on this subject in our earlier submissions because we are completely opposed to any development on this Green Belt site. However, should the Inspector be minded to allow the appeal, we ask for the following views to be considered.
26. Although the application is for outline permission only, the “illustrative” plans shown in the Design and Access Statement contain substantial faults, noted in the LPA’s Urban Design Officer’s letter of 21 March and in section 7 of the Case Officer’s report. The design principles proposed do not provide a robust basis for any future reserved matters submission, and would frustrate the council’s ability to secure a well-designed scheme.



Our own views on reserved matters, if the appeal should be allowed in spite of the strong opposition in this community (over 1100 individually written objections) are as follows.

**Reserved matters: Number of dwellings**

27. The illustrative proposals are excessive for this 29-hectare site with its many landscape and ancient woodland restrictions. The proposal is for up to 380 homes, a one hundred unit retirement village (i.e. a further 100 homes) as well as the various community facilities. No evidence has been presented to justify the numbers proposed. In view of the sensitive location and landscape of the site, the design and density of the development layout is a key factor.
28. No housing should be built on the side of the chalk dry valley at the western end of the site near the present Homestead Farm. Although the dry valley covers most of the whole site, this section is a particularly attractive aspect of the dry valley, visible from neighbouring roads, and should be left undeveloped.

**Reserved matters: Destruction of existing topography**

29. The first phase proposals make a brief reference to 'cut and fill', but give no detail. Given the topography and varying gradients this could be much more extensive than the impression conveyed, which would be highly undesirable.

**Reserved matters: Parking**

30. Generally, the arrangements proposed for parking appear seriously inadequate.
31. Experience in Little Chalfont has shown that the number of cars per household tends to exceed the off-road parking space provided, even if the Buckinghamshire Council Parking Guidance standards are observed. Measures should be taken to avoid the need for regular roadside parking, which turns narrow residential streets into ugly single track systems.
32. No road widths are given. Although there is a reference to lay-bys for visitor parking, there is no clarity that this will apply throughout.
33. Inadequate parking is proposed for users of the community hub. There is no assessment of the likely parking need there for users who are resident on the site, for outside visitors, or for staff.
34. There is no clarity about parking arrangements in the retirement village for residents, carers and for visitor parking.
35. The proposed skateboard and BMX park (which we oppose, see below) makes no provision for car or bicycle parking or drop-off space.

**Reserved matters: Community hub**

36. The local community have made it clear in surveys that they wish for a new community centre on the existing site in Cokes Lane, and proposals are being drawn up for a planning application. Any eventual proposals for a second community hub at the eastern edge of the village on the new development should be discussed with the parish council and community organisations.

37. Such a secondary hub should not be planned only for site residents, but should encourage integration with the rest of the village and complement the new community centre.

**Reserved matters: Retirement village**

38. All the illustrations show blocks of flats, but there is reference in the parameter plans to the precise design being subject to reserved matters.
39. Blocks of flats would certainly not create a 'village' feel. A mix of bungalows, houses with 1, 2 and 3 beds and flats is envisaged, although, given the limited space available, this would clearly reduce the number of dwellings below the 100 proposed.

**Reserved matters: Downsizing**

40. There is no evidence that any assessment has been made of the needs of the community in downsizing. The ultimate mix of properties should be subject to consultation.
41. When the Harvard Grange development (off Burtons Lane) was built, residents of local roads said that, although planning to downsize, they would still be looking for reasonably spacious accommodation. This information was passed to the developer, with the sort of square footage sought, but this was ignored and the flats created were not big enough to attract much local interest.

**Reserved matters: Gradients and disabled people**

42. There are references in the parameter plans to compliance with the Equalities Act, but no detail on how gradients for wheelchairs and others with disability aids will be achieved. The 'cut and fill' plans mentioned above could make this a serious problem.
43. All illustrations give the misleading impression of level ground. It should have been made evident at outline stage that the needs of disabled people could be effectively accommodated throughout the development.

**Reserved matters: Property heights, locations and densities**

44. We object to the height of the flats and houses proposed at the highest point of the site (north-east) close to Oakington Avenue and Village Way, where they will be highly visible. Tall houses are also proposed on the side of the dry valley near Homestead Farm, where we would prefer to see no building at all for the landscape reasons given above.
45. Neither of the above proposals would meet the NPPF requirement that developments should be in context with neighbouring properties. The densities proposed are higher than in adjacent roads including Village Way and Loudhams Wood Lane.
46. No height details are provided for the retirement village, community hub or care home.

**Reserved matters: Skateboarding / BMX park**

47. We have never received any indication from any resident in Little Chalfont, or elsewhere, that there is a demand for such a facility in the village, and we oppose it for environmental reasons. There is a skateboard park nearby in the centre of Amersham. This type of recreational activity is at odds with the rural location of the site.
48. If, as proposed, there would be housing on the Homestead Farm side of the dry valley, this facility would be a noisy blight on the view of what is left of the dry valley landscape.

49. Recreation possibilities in and near the site should be for quiet and appropriate countryside activity such as walking.

**Reserved matters: Oakington Avenue**

50. Provision must be made for a lay-by to permit car drop-off for people using the pedestrian path across the new bridge, including for access to any school built on the site.

**Reserved matters: Protection of woodland**

51. Buffer zones for ancient woodland should be at least 50 metres, as recommended by the Woodland Trust on page 20 of their Planning Guide for Ancient Woodland, throughout the site.

**Reserved matters: Tree-lined streets**

52. Paragraph 131 of the NPPF requires that new streets should be tree-lined, unless there are compelling reasons why this would be inappropriate. Despite the rural setting, space for trees does not appear to have been adequately provided, or considered, in the existing parameter plans. Adequate provision of trees, which we would support, would probably require a reduction in the number of dwellings proposed.

**Reserved matters: Construction Traffic Management Plan**

- 53. The appellant accepts that more detail is needed. We have the following strong concerns.
- 54. The evening rush-hour time should be revised to 3pm to 7pm to allow for school finishing times, which already create congestion in Little Chalfont.
- 55. It is not acceptable that there would be only limited parking on site for construction vehicles. There should be a strict condition that all construction and delivery vehicles must be accommodated on site.
- 56. Catering for all construction workers should be provided on site. Existing congestion in the village would be greatly worsened if they travel by car to use shops and cafes. A creative solution would be needed to allow additional trade to reach the shops while not disadvantaging local residents during the long construction period.
- 57. Arrangements must be made for wheel-washing of vehicles leaving the site.

**Reserved matters: Name change**

58. The name 'Little Chalfont Park' will cause confusion for many visitors, as there is already a Little Chalfont Nature Park. A change of name should be agreed with the community.

**Reserved matters: Draft Heads of Terms**

59. If this development goes ahead, the existing community will be adversely affected, yet there is nothing in the Heads of Terms that obliges the developer to contribute to compensating improvements, if appropriate under a section 106 agreement. Our published Community Improvement Plan should be a source of ideas.

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## PARAMETER PLANS

60. The appellant expects that planning conditions attached to outline permission will require the layout and scale brought forward under reserved matters applications *“to be in accordance with the development specification contained in the Planning Statement and approved parameter plans.”* However, approval of the parameter plans as submitted would permit many of the proposals, and omissions, which we have identified in our objection and under Reserved Matters above as unacceptable. We see this as a further reason for dismissing the appeal.
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## POTENTIAL CONDITIONS

61. The evidence that we have supplied strongly supports a conclusion that neither Lodge Lane nor Burtons Lane can be considered viable access points, but if the Inspector should be minded to approve them, we would recommend that the following conditions are imposed.
62. No work whatsoever, including demolitions, should begin on the site until, at full application stage, all outstanding reserved matters have been agreed with the LPA. Once these have been agreed, the widening of Lodge Lane should take place before any other construction work is begun – to limit the increased danger to other road users when construction vehicles are travelling to and from the site.
63. Furthermore, it is anticipated that the appellants would be disposing of the site if the appeal were to be allowed, and it would be inappropriate for any preparatory work or demolition to take place until the site is in the ownership of the final developer.
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## COMMENTS ON THE APPELLANT’S STATEMENT OF CASE

64. As the appellant’s Statement of Case is a new document, we think it right to make comments in this submission on points which particularly concern us.

References are to the numbered sections in the Statement.

**2.6.** The statement is incorrect. The site is not surrounded by built form. Much of the eastern border along Lodge Lane is adjacent to the woods and fields of the AONB. About half of the southern border is adjacent to open fields within the Green Belt. South of those fields is Long Walk, a line of houses identified in the adopted local plan policies map as a “row of dwellings in the Green Belt”. South of that row begins the AONB in Green Belt. The northern border consists of the railway cutting, which forms a Green Belt boundary.

**2.9.** Pedestrian access to the Chess Valley part of the AONB is not easy. The path inside the field adjacent to Lodge Lane (which we understand to be ‘permitted’, not a PROW) can be difficult in muddy conditions. Hikers, including those from the proposed development, would instead walk up the hill in Lodge Lane, which is already dangerous to pedestrians. This hill would be more heavily trafficked under the proposals, increasing the danger. No pavements or lighting are proposed – and

would in any case be inappropriate in the rural context. The only alternative walking route to the Chess valley is the much longer PROW footpath LCF/11/1 towards Chenies.

**Assessment of the site through the council's Green Belt evidence.**

**2.23 – 2.33** We draw attention to two fundamental points to refute the appellant's claims:

(i) The application site is not the same as the site proposed as SP BP6 (General Area 35 in the earlier Green Belt Assessment 1). The application site is purer Green Belt because it does not include the Honours Yard industrial area, and contains less than 1% built form.

(ii) In paragraphs 18-23 above we draw attention to flaws in the evidence base, including in the Green Belt Assessment of General Area 35 (later site SP BP6).

**4.11** In our view the evidence base was flawed. See above under 2.23 – 2.33 (ii).

**4.15** The 'relatively short section' of Lodge Lane, which would be so badly affected, is a large part of the most attractive and rural section of the lane, of special importance because it provides such a sudden and delightful change from urban to rural on the edge of the village. To offer the excuse that "such a change will most likely be experienced through vehicles" is irrelevant. Appreciation of the beauties of the AONB and its adjacent lanes is not limited to pedestrians. Furthermore, the proposed development, if permitted, would increase the number of pedestrians using this section of Lodge Lane.

**4.27, 5.59** and CS24 on page 29 refer to the appellant's claim of a net gain in biodiversity. But the case officer's report 13.17 refers to a net loss of biodiversity. We draw attention to the detailed analysis of this matter in section 3.3, and conclusion 4.1.4 of the professional study by Bioscan at Appendix C to our submission of 19 January 2022.

**4.31** indicates that the Ashridge Common issue may be mitigated, but Natural England's objection, posted by the appellant on 29 July, refers also to other areas of objection, not answered by the appellant.

**5.3** The site which was assessed against Green Belt purposes was not the application site, but a larger one (then called General Area 35) which included the Honours Yard industrial area. As we have shown (see under 2.23 – 2.33 (ii) above) even the selection of General Area 35 did not follow the methodology prescribed for the study.

**5.23** Research by the parish council shows that, out of a total of about 2800 homes in Little Chalfont, well over 450 are housing association properties (see para 91 of our submission of 19 January 2022).

**5.61 – 5.65** The published parameter plans show no adequate parking provision for a community centre. In surveys the community have supported a new centre on the

existing site in Cokes Lane, and plans for this are still in hand. If the proposed development is permitted, some kind of local community hub, with suitable parking, may be appropriate, but not one replacing the Cokes Lane building. The Cokes Lane building is in the centre of the village at a distance easily walkable from many residential roads.

**Page 29 CS25.** We disagree that there is no conflict with CS25. See paras 43-74 of our submission of 19 January 2022, in particular paras 70-72 about the high impact on the village centre, and Appendix A to that submission, the independent professional highways assessment by Paul Mew Associates.

**Page 29**, Policy CS22, last sentence, and 6.27. The development would be highly visible from PROW footpath LCF/11/1 as it climbs from Lodge Lane (opposite the proposed site entrance) into the AONB woodland.

**6.18** See our comments on the Green Belt Assessment above.

**6.30** This statement is misleading. Policy CS1 not only requires the focus of new development to be outside the AONB and Green Belt, but specifically limits the focus for development in Little Chalfont to the existing built-up area. *“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.”*

**Little Chalfont Parish Council**

**Little Chalfont Community Association**

**11 September 2022**