

STATEMENT BY LITTLE CHALFONT PARISH COUNCIL AND LITTLE CHALFONT COMMUNITY ASSOCIATION, 8 DECEMBER 2022

1. Thank you for this opportunity to speak on behalf of Little Chalfont Parish Council and Little Chalfont Community Association. Printed copies are available of what I am going to say.
2. As the correspondence on the Bucks Council website shows, there is massive opposition to this application among residents in Little Chalfont. I want briefly to summarise the main concerns of our community.
3. The details of these concerns were in our written submission of 19 January. That submission was accompanied by three professional reports on landscape, highways, and ecology. We sent short updates on 10 March and 8 April. We submitted a further written statement, to this inquiry, on 11 September.
4. We ask, sir, that you will consider and take account of all those documents. We understand from your Note number 2 of 2 December that the professional studies on highways and ecology may still be of interest to you, although statements of common ground on those topics mean that evidence will no longer be given at the inquiry. With regard to the Green Belt and Landscape, we invite you to consider in particular the two professional reports on landscape which we provided from the Michelle Bolger Expert Landscape Consultancy. Those are: a Review of the Landscape and Visual Impacts of the appeal site, attached to our submission of 19 January, and a Site Appraisal of the larger site, formerly proposed for development in the withdrawn Chiltern and South Bucks Local Plan, attached to our submission of 11 September. The Site Appraisal challenges the evidence base for the withdrawn local plan.
5. I will now outline the chief concerns of the community.
6. The first is the proposed loss of a large area of almost unspoiled Green Belt, which contains **less than** 1% of built form.
7. The appeal site is beautiful, with grassland, ancient woodland and chalk dry valley. On two sides, west and north, the site makes a very attractive border to the village, visible from the homes of a large number of residents on Burtons Lane, Loudhams Wood Lane, Village Way, Oakington Avenue, The Retreat, and Long Walk, and visible to travellers and hikers on parts of Burtons Lane, Lodge Lane and on the Public Right of Way nearby in the AONB.
8. The appellant says, for example in section 2.6 of his statement of case, that the site is quote “surrounded by existing built form.” That is not correct, as the illustration at figure 1 in the appellant’s own statement of case will show. There is open AONB/ Green Belt land immediately to the east. Moreover, half of the southern border is adjacent to a strip of open Green Belt land, beyond which is some rural housing washed over by the Green Belt and classified in policy GB4 of the adopted local plan as ‘Rows of dwellings in the Green Belt’. There is no doubt that the appeal site is outside the built-up area of Little Chalfont. It is adjacent, but on the west and north sides only.

9. We object to the idea in paragraph 3.69 of the appellant's landscape proof of evidence, which implies that Green Belt land adjacent to existing development is weaker green belt simply because it is adjacent. Whatever other reasons there might be for proposing development next door to a settlement, that one must be wrong. The NPPF does not distinguish between different qualities of Green Belt land. If it were the case that land adjacent to existing development is always weaker, the inevitable result would be that the whole Green Belt would gradually be eroded away. This cannot have been the intention of the founders of the Green Belt, or of the authors of the NPPF.
10. The impact of the proposals on the openness of the wider Green Belt is important, and is addressed in detail in paragraphs 35 onwards of the Landscape and Visual Impacts Review by Michelle Bolger, to which I have referred.
11. We challenge the view of the appellant, in paragraph 4.29 of the landscape proof of evidence, that the former golf course limits the role of the site in safeguarding the countryside from encroachment. This is not correct, since the golf course was removed many years ago and no significant signs of it remain. No-one looking at the site now from outside its borders would assume that it had once contained a golf course. The mess of gates and fencing at the former entrance is temporary and cannot be regarded as having any lasting effect on the rural nature of Lodge Lane or its link to the AONB.
12. Turning now to other landscape matters, a very important feature is the chalk dry valley, which passes through the site. Local residents received a letter circulated on 30 December 2021 by the Directors of Biddulph Buckinghamshire LTD to most homes in Little Chalfont. It was headed 'message to the community' and contained the following statement "*We understand the importance of the dry valley. That is why there will be no housing in it.*" That statement is not consistent with the illustrative masterplan on page 90 of the Design and Access Statement, or with the recent revision of that masterplan. All those documents show extensive building on the northern slope of the dry valley, down to below the 105m contour line in places (see section 4.4.7.6. of the council's landscape proof of evidence)
13. In any event, the upper slopes of a valley are as much a part of it as the lower slopes and the valley floor. Building in any part of the dry valley, including roads on the valley floor, harms its legibility as a valued rural feature, characteristic of the Chiltern landscape.
14. It is stated, in paragraph 3.13 of the appellant's landscape proof of evidence, that the Landscape Character Assessment 18.3 "Little Chalfont Rolling Farmland ", does not identify dry valleys as a feature of our local landscape. That is incorrect. The valleys are noted in the LCA 18.3 description, which says "incised valleys in the east create gentle slopes and undulations".
15. A particularly damaging process in the dry valley would be the 'cut and fill' excavations needed to make level housing and roads, but destroying the shape of the valley slopes.
16. A further major concern in the community is the proposal to use Lodge Lane and Burtons Lane as access roads. Final agreement to this is requested in the outline

application. Those two roads are totally unsuitable for the purpose, both for environmental and for highways reasons. The strong environmental case against their use is well made in the Michelle Bolger Review of Landscape and Visual Impacts that I have mentioned, and in the council's landscape and planning proofs of evidence. The appellant's characterisation of Lodge Lane in the proof of evidence is incomplete, failing to mention its prevailing rural character with narrow width, sunken form, earthen banks and extensive tree and woodland cover. Lodge Lane is typical of sunken lanes in the Chilterns AONB, with which it forms the appeal site's border.

17. The highways case against the use of Lodge Lane and Burtons Lane has been made in our submissions.
18. The third main public concern is about the AONB. The Chilterns Conservation Board, in their letter of 23 August, show that great importance is attached to the setting of the AONB, and give details of the harm which the proposed development would do to that setting. The council's landscape proof of evidence makes similar points.
19. We also note that Natural England, in their letter of 4 November, point out that the appeal site itself is under consideration for inclusion in the AONB, and that this may be proposed in about two years' time. That strengthens the case for letting the future of the site be decided in the new Buckinghamshire local plan, which will appear at about the same time and will consider Green Belt and AONB issues across the whole county in planning future development.
20. The last major community concern I want to mention is found in most of the 1100 letters of objection from the public, and is the loss of amenity which will occur if the village, and especially its centre, becomes even more congested than it is at present. Little Chalfont's physical, social, and medical infrastructure has already absorbed two large new housing estates in recent years, and the proposed development would bring a further 17% increase in households. We spelt out the details of this concern in paragraphs 70-72 and 88-90 of our submission of 19 January. In that context we are disappointed that a statement of common ground has been agreed on highways matters. We see, sir, from your Note 2 of 2 December that interested parties should not be prejudiced by what has been agreed by the main parties, and that although evidence will not be formally presented on the issues, you will still need to address them in your decision. In those circumstances we would like to address an email to you outlining our continuing objections on highways grounds.
21. I have listed the concerns which members of the public mainly raise with us. I now want to mention an objection which we have made throughout the application process, concerning the evidence base for the withdrawn Chiltern and South Bucks local plan.
22. That plan contained a proposed development to which our community was very strongly opposed. This was the site known as BP6, which included the present appeal site of 29 hectares plus an additional 17 hectares of land. The difference between the two sites is very important. Site BP6 included the Honours Yard industrial/commercial area, meaning that the proportion of existing built form on

site BP6, although less than 5%, was much greater than the proportion of built form on the appeal site. The appeal site is therefore purer Green Belt.

23. Of course the Chiltern and South Bucks local plan was never tested at public examination, and was withdrawn. It has no status in planning matters. The evidence base prepared by consultants for the plan was also contentious and has never been tested at examination. However, the two parties have agreed that the evidence base "*can be a material consideration*", and the appellant leans heavily upon it in his case.
24. In our written statement of 11 September, as in our earlier submissions, we identified three serious faults in that evidence base. These faults, in our view, made it wrong for Chiltern and South Bucks to include site BP6 in their proposed plan.
25. The details of the three faults are set out in paragraphs 18-23 of our written statement of 11 September and in the site appraisal by the Michelle Bolger consultancy attached to that statement. We respectfully draw your attention to that material, because we understand that objections to the evidence base of the withdrawn local plan will not be made by the council, and are being made only by us.
26. I have outlined our main objections to this appeal. There are other detailed points on which we may want to ask your permission to put questions to some of the witnesses. We would also like, if possible, to have an input to discussion of reserved matters, on which we commented in detail in our written statement of 11 September.
27. Finally, we have heard the news about the government's decision to allow new flexibility on housing targets. We look forward to hearing whether or not this could affect the five-year land supply requirements in Chiltern District.
28. Thank you.
