

Chalfont St Giles Parish Council

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Mr Graham Mansfield
Principal Planning Officer
Chiltern District Council
King George V Road
AMERSHAM
HP6 5AW

Dear Mr Mansfield

Re Planning Application PL/19/4421/FA Land Off High View, Chalfont St Giles

The Parish Council formally **OBJECTS** to the proposed application and requests that the following comments to be taken into consideration by the Local Planning Authority (LPA) when determining the application.

1. The Development Plan

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework 2019 (NPPF) regard is to be had to the development plan, and the determination shall be made in accordance with the plan unless material considerations indicates otherwise.

The development plan comprises the Chalfont St Giles Parish Neighbourhood Plan (2014 - 2036) (NP), the Chiltern District Adopted Local Plan (1997) (Consolidated 2011) (LP), the Local Development Framework Core Strategy for Chiltern District (2011) (CS). Also relevant are the Affordable Housing Supplementary Planning Document (2012) (SPD) and the Sustainable Construction and Renewable Energy (2015) SPD.

The Chalfont St Giles NP was made on 23 July 2019. Paragraph 30 of the National Planning Policy Framework states that *"Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently."* The NP carries significant weight in the determination of this application.

The NP outlines the lack of affordable housing provision as a key social issue within the Parish, noting that *'More work should be undertaken to identify areas for the building of affordable housing that does not impact the natural environment'*.

Objective 1 of the NP outlines a need to *'create a balance of housing sizes in new developments in the community'*. Objective 6 seeks to *'Maintain and enhance the rural character of the Parish, and conserve heritage assets and their setting'*. Objective 7 supports *'high quality and locally sympathetic design that is sensitive to the setting of the Parish'*.

Consideration of NP policies, together with a review of the wider development plan are outlined in detail, below.

2. Emerging Local Plan

Emerging local policy is set out in the Chilterns & South Bucks Local Plan 2036, which was submitted for examination in September 2019. It is not believed that a date has yet been agreed for Examination, and as such, limited weight can be attributed to policies in the emerging Local Plan at this time.

Nevertheless, the evidence base which informs the preparation of the Local Plan is highly material to the determination of this application. The Council has produced an updated Housing and Economic Land Availability Assessment (HELAA), published in January 2020, which focuses on land available for housing, employment and other economic development uses.

None of the sites promoted within the Chalfont St Giles Parish were deemed suitable for development due to protections afforded to the Green Belt and/or the Chilterns Area of Outstanding Natural Beauty (AONB) designation, (also noting a lack of previously developed land, and areas of high flood risk). Consequently, all sites were rejected by the LPA at Stage 1.

Whilst the Parish Council recognises a clear need for the provision of affordable housing within the Parish, the LPA has already highlighted that the development of Green Belt sites is not favoured, due to potentially significant impacts on the openness of the Green Belt, the special qualities of the village and surrounding rural areas.

While Housing Policy 2 is not relevant to the determination of the application - as it relates solely to well-integrated affordable housing in the built-up area - the NP's choice of language '*well integrated*' is a clear driver towards delivering socially sustainable development for the Parish.

3. Rural Exception Sites within the Green Belt

The location of the development and its proximity to the Parish boundary is a key concern of the Parish Council. The emerging joint Local Plan for Chiltern District Council and South Bucks does not propose strategic changes to the Green Belt or the Neighbourhood Area.

Housing Policy 1 (Rural Exception Sites in the Parish) is the key policy relevant to the determination of the application. The policy draws on the NPPF Annex 2, which advises that rural exception sites will be considered as '*small sites used for affordable housing in perpetuity where sites would not normally be used for housing*'.

CS Policy CS9 (Affordable Housing In Rural Areas) states that '*exceptionally, land adjoining or closely related to the existing built - up areas of settlements or villages, which would otherwise be considered inappropriate for development, may be developed in order to provide affordable housing for the community*'. Crucially, the policy requires that '*the development is small-scale, no greater than required to meet the current need and respects the setting, form and character of the settlement and the surrounding landscape*'.

LP Policy GB2 (Development in General in the Green Belt) does not include any commentary of the role of rural exception sites for affordable housing (as introduced by the NPPF) and therefore the weight that can be attributed to the policy is limited.

Substantial weight must be given to the harm to the Green Belt in accordance with paragraph 144 of the NPPF where '*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'.

An exception to the definition of inappropriate development includes (paragraph 145): '*limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)*' (Clause f).

Paragraph 145(g) goes on to confirm, that '*limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings)*' can also represent an appropriate exception to inappropriate development, provided that the development would not:

- '*have a greater impact on the openness of the Green Belt than the existing development;*
or
- '*not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority*'.

The first limb does not apply, as the release of the site for housing would clearly have a greater impact on the openness of the Green Belt. The site does not constitute previously developed land for the purposes of the second limb, therefore 145 does not apply.

The five purposes of the Green Belt are defined by paragraph 134 of the NPPF:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Purposes a) to d) are all relevant to the assessment of the application. The Parish Council considers, notwithstanding the site's enclosure, that the development at the scale proposed (42 units), noting also that the site forms the first phase of a wider development of up to 90 units, represents a harmful encroachment of development in the countryside that would have an urbanising affect and would demonstrably harm the open character of the area. The scheme cannot be considered a limited infill affordable housing and the development therefore conflicts with the aims of preserving openness and at least one of the five purposes of the Green Belt.

On the basis that the development is considered to conflict with paragraph 144 very special circumstances are required. Consideration of affordable housing and the weight attributed to this as part of the planning balance, is considered further and separately as part of these representations; however, on the basis of the development's substantial harm to openness, VSC are not considered to exist. Therefore, despite the tilted balance being engaged due to the Council's lack of a 5-year housing land supply, in line with paragraph 11(d)(i) and the application of the NPPF relating to protected areas, permission should be refused.

4. Scale of Development

Whilst the Parish Council supports the provision of small sites as rural exceptions within the criteria outlined within the NP, which is in conformity with the wider development plan and the NPPF.

The NP also outlines that *'the redevelopment of certain plots to expand and accommodate the next generation could cause an over intensification of development in the Parish.'* It is not in the spirit of the NP, the LP or the NPPF for rural exception sites to be phased and the amassing of such a high proportion of affordable housing development together, will result in poor social integration with the wider community.

This proposed scheme, submitted as a rural exception site, is far bigger than any other in the Chiltern District Council area and would be the largest development delivered in Chalfont St Giles over the last 30 years. The highest currently being a scheme of 28 units at Townfield Lane (Application reference CH/2007/2062/FA), to which the proposed scheme is 1.5 times larger.

The application site covers an area of 2.38 hectares and the submission seeks permission for more than 10 units, therefore falling cleanly within the definition of 'major development' for the purposes of the NPPF. The proposal does not achieve support under paragraph 71 of the NPPF as the scale of the development does not meet the definition of an entry-level exception site and specifically paragraph 71 (b) as it would compromise the protections given to the Green Belt.

Whilst the submitted Planning Statement contends that the proposed scheme falls within the definition of 'small scale', it also confirms that the proposal of 42 units is a first phase of development for the site, which would be likely to see an additional provision resulting in a development scheme of approximately 90 new homes. The Parish Council therefore contends that it is disingenuous to argue that the scheme can be reasonably be considered to be small scale, whilst earmarking further expansion.

Planning law is clear that each application must be considered on its own merits, although references to a later phase of development adjacent to the application site is a material consideration carrying significant weight in the Councils determination. The proposed scheme incorporates a design and layout to accommodate further development of the northern section of the landowner's site at a future stage, however the submitted evidence within the combined Green Belt Analysis & Landscape and Visual Impact Assessment fails to have regard to this proposed two phased development.

5. Housing Needs Survey

The Parish Council is concerned with the data output used within the Housing Needs Survey (HNS) conducted by Arc4; it considers this report is based on flawed data and the number of properties stated to be necessary in this survey.

The Parish Council has already outlined its concerns, both to Paradigm Housing Group and the LPA, regarding the process of consultation undertaken by Arc4, which informs the December HNS. The Parish Council has openly stated that it intends to undertake its own HNS in addendum to the made Neighbourhood Plan.

The Arc4 consultation relied on responses through a questionnaire delivered to the HP8 postcode (which is much bigger than the actual Parish). At two public meetings grave concerns were raised about the ability to respond more than once to the questionnaire by using different electronic devices and also responding by post. Arc4 later stated that they had addressed this problem but refused to restart the survey. There is a likelihood of duplication because of this

method of consultation. The questionnaire used was also flawed, as questions were misleading or imprecise in their nature. For example, the questionnaire asked participants about the tenure of property they would 'like', as opposed to what they might 'need' based on personal circumstances.

The Arc4 report does not fix on a consistent scale of data collection, switching between district, ward and parish scales and trends. This has the potential to skew the outcome of the report and therefore the Parish Council remains concerned that the survey has not considered the circumstances specific to Chalfont St Giles in sufficient detail.

Finally, Paradigm circulated to the Parish Council a 'confidential' version 1 analysis of the Housing Needs Survey which the Parish Council responded to. The version presented in the planning documents is version 3. The Parish Council have compared the two documents which do vary in some of the explanations given however the base data also varies. This variation must question the validity of the whole Housing needs survey and the subsequent conclusions. (Document submitted separately.)

A Freedom of Information request was submitted to Chiltern District Council in October 2019, which revealed that 18 residents of Chalfont St Giles are listed as looking for affordable housing. Since 2014, there have been 69 allocations of affordable housing within the Parish Boundary, which has not been considered as part of the Arc4 study, and contradicts the position set out by Paradigm to allocate such a substantive amount of affordable housing in the Green Belt.

6. Availability of Health Services

The NPPF has three overarching objectives to achieve suitable development: economic, social and environmental. The social objective seeks to support 'strong, vibrant and health communities' by providing accessible services to support their health. Policy CG31 of the CS seeks to ensure that *'new development proposals must ensure that adequate infrastructure capacity is available to meet the needs of future occupiers and not intensity existing deficiencies.'*

The Parish Council has assessed the Healthcare Impact Assessment submitted with the applications (EPDS Consultants, 2019) and has reviewed the data which compares GP numbers with the number of registered patients (page no.9). The Parish Council has also contacted the practice managers at each surgery who confirmed that each practice does have the number of registered GPs as stated in the Assessment. This reveals that the report has failed to acknowledge the full-time equivalents (FTE) of each of the GPs. An updated table has been provided below which details the number of patients per FTE GPs.

	Registered patients	Registered GPs	Patients Per GP	FTE Registered GPs	Patients per FTE GPs	Average difference
Giles Surgery	12,146	9	1,350	5	2,429	
The Misbourne Surgery	12,146	9	1,350	5	2,429	
Hall Practice	9,859	12	822	4.5	2,191	
Allan Practice	8,976	4	2,244	4.5	1,995	
Total 4 practices	30,981	25	1,239.24	14	2212.93	
Bucks 50 Practices	566,585	434	1,305	434	1,305	907.93
National Average			2,000		2,000	213

Figure 1 - Extract from Healthcare Impact Assessment

This data has been compared with the data included in the Healthcare Impact Assessment (2019) which outlines the number of patients per GP for the whole of the BCCG area as well as the National Average. It has been found that the services within the area have an average of 908 additional patients per GP compared to the BCCG average and 213 additional patients compared to the National Average. It is considered that the conclusions of the Healthcare Impact Assessment (2019) are fundamentally incorrect as it fails to acknowledge the FTE of GP services and further research must be conducted prior to a decision being made on the application.

Notwithstanding the above, the Healthcare Impact Assessment (2019) states that the first stage of the development for 42 dwellings would a population increase of 98.8. The Parish Council contends that the increase of 98.8 residents into the local area would have a severe impact upon the already underserved GP practices in the local area, and insufficient evidence has been provided to demonstrate that there is adequate infrastructure capacity contrary to policy CG31. Ultimately, the proposals would fail to comply with the social objective of the NPPF through an inability to provide accessible services to support the populations health and this should be afforded significant weight in the planning balance.

7. Transport and Accessibility

The NP outlines that *'there is a continuing need to create a safe, secure and pedestrian-friendly village environment, with a reduced impact from traffic'* and that *'there is a lack of public transport, leading to over-dependence on cars and difficulties for non-car owners'*.

Policy CS29 of the Core Strategy confirms that the Council's strategy to ensure inclusiveness within its local communities includes *'To locate new development near to existing community infrastructure, frequent and reliable public transport services and main transport routes'*.

The High Street and Village centre of Chalfont St Giles contains the local facilities which serve the community. An excerpt from the NDP which highlighted the local facilities in the area is shown below.

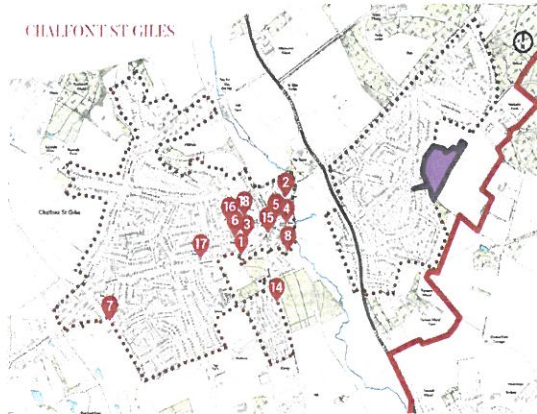


Figure 2 - Excerpt from the Neighbourhood Plan indicating village services and facilities (numbered) with the location of the application site (yellow)

The Design and Access Statement (Paradigm, December 2019) (DAS) cites that *'the High Street and village centre is located approximately 1km to the south west of the site. These facilities are walkable within 13-18 minutes or a 5-6 minute cycle ride.'*

The pre-application advice from the Highways Team at Buckingham County Council outlines guidance from The Chartered Institution of Highways and Transportation (CIHT) publication *'Guidelines for Providing for Journeys on Foot'* (2000). The guidance states that the *'average length of walk journey is 1km'*. The pre-application advice goes on to acknowledge that while the majority of local amenities are located approximately at this 1km buffer, there are significant gradients to reach the village centre, which are likely to reduce the distance that is likely to be considered a manageable walk. It is advised that this issue would need to be addressed in a transport assessment.

The submitted Transport Assessment (MEC, December 2019) (TA) provides the gradients of three key routes. The DfT's *'Inclusive Mobility'* (2005) states that *'there is general agreement among guidelines from many countries that an 8 per cent (1 in 12) slope is the maximum that may be used; anything greater than this will cause difficulties for manual wheelchair users. Most guidelines also agree that 5 per cent (1 in 20) is preferred.'* Given this information, the key route titled *'London Road 'Kings Road' bus stops to site'* is steeper (1 in 18) than the preferred 1 in 20 and therefore may be difficult for a number of pedestrians travelling this route, especially those with reduced mobility.

The TA also recognises that the gradients that have been calculated are averages of entire routes and *'steeper sections at present along these routes'*. The Assessment proposes a rest area on Stylecroft Road *'to assist pedestrians who may need to stop along the route'*. The Parish Council does not consider that this mitigation is sufficient to address the concerns raised in the pre-application advice and would do little to encourage all residents to travel by sustainable means, especially those with disabilities, contrary to paragraph 110 of the NPPF. The majority of residents, particularly the elderly, are unlikely to walk the required distances to access services, instead relying on the use of private motor vehicle.

The DAS advises that the nearest bus stops to the site are situated on London Road (A413) and are located approximately 500-550m south west of the site (a walk of 6-7minutes). The pre-application advice provided for the scheme cites The Institution of Highways and Transportation publication *'Planning for Public Transport in Development's'* which states that the *'maximum walking distance to a bus stop should not exceed 400m and preferably no more than 300m'*. It is

clear therefore that the nearest bus stops are well beyond the maximum recommended walking distance.

Notwithstanding this, as discussed in the previous section, the TA outlines that this key route to the nearest bus stop has a 1:18 average gradient. This is steeper than the preferred gradient of 1:20 and may be challenging for those who have difficulty walking. Therefore, the journey from the site to the nearest bus stop would be both steeper and longer than the recommended figures provided by national guidance. This is an important material consideration carrying significant weight against the proposed development.

With regards to the amount of public transport in the area, the TA outlines all of the bus service which operate in close proximity of the site. As displayed in the table, it is clear that the bus service do not run frequently, in the evenings or on Sunday's which greatly reduces the sustainability and accessibility of the site.

Service	Operating Days	Operating Times	Frequency (up to)	Route	Provider
Public	105	Mon – Fri	05:41 – 18:40	Hemel Hempstead to Uxbridge	Carousel Buses
		Saturday	07:12 – 18:10		
	335	Mon – Fri	10:57 – 13:13	Amersham to Slough	Redline
	580	Mon – Fri	08:06 – 16:57	High Wycombe to Uxbridge Via Beaconsfield	Carousel Buses
		Saturday	08:23 – 16:56		
School	BB12	Mon – Fri	07:25 / 16:30	Gerrards Cross to Marlow Hill Schools	Go Ahead Bus
	DCH4	Mon - Fri	08:06 / 15:54	Seer Green to Dr Challoner's High School	Imperial Coaches
	653	Mon - Fri	08:06 / 16:19	Chalfont St Giles to Dr Challoner's Grammar School	Ashwood Travel

*E/W = Each Way
Timetable data taken from Traveline.info.

Figure 3 - Excerpt from M-E-C Transport Assessment 1A (Page 23)

It is noted in the TA that there are no railway stations within walking distance of the site. It is claimed that Chorleywood Rail Station is within cycling distance of the site (4.4km) however the route is rural, poorly lit, and many future residents may feel uncomfortable taking this route, particularly families and the elderly. The TA goes on to state that Amersham Railway station is 6.7km away and is accessible by the 105 bus service. As discussed above, this bus service does not run frequently, in the evenings or on Sundays and therefore it would be unrealistic to assume that residents would choose this mode of transport above private motor vehicle.

The NP already acknowledges that there is 'a lack of public transport, leading to over-dependence on cars and difficulties for non-car owners' and this is highlighted as a key issue within the plan. The proposal would exacerbate this problem and the TA has not been able justify the material harm that the proposal would cause in terms accessibility and sustainability. It is therefore considered that the proposal does not address the concerns raised in the pre-application advice and would therefore be contrary to paragraph 110 of the NPPF.

Given the above discussion, it is likely that residents will be reliant on the use of private motor vehicles for travel both in and around the area. The Parish Council hold serious concerns about the number of new vehicles that will need to use Kings Road to leave the site. Kings Road has access the A413 which is currently difficult to enter due to heavy volume of traffic and this will only get worse with the inclusion of traffic lights on the A413 and HS2 traffic to and from sites north and south of the village.

The TA states that the proposed development will generate 32 two-way trips during the AM and PM peak periods. The assessment also provides capacity analyses at the following junctions:

- o Junction 1- High View/ Stylecroft Road Priority Junction

- Junction 2- Stylecroft Road/ Kinds Road (NE) Junction
- Junction 3, Stylecroft Road/ Kinds Road (SW) Junction
- Junction 4- Kings Road/ London Road (A413) Junction
- Junction 5- London Road (A413)/Pheasant Hill/ Vache Lane (B4442) Junction
- Junction 6a- Gorelands Lane/ B442 Nightingales Lane/B4442 Vache Lane Junction
- Junction 6b- Kings Road/Gorelands Lane Crossroad Junction

The TA advises that junctions 1, 2, 3, 6a and 6b require no further work to be undertaken as they operate well within capacity at a 2031 *'Do Something'* scenario. It was found that Junctions 4 and 5 operate at over capacity during some movements, however this is largely due to existing passing flows and committed development flows. The TA concludes that the proposed development would send few traffic movements through these junctions and therefore, no further work is required.

One aim of the NP is to create *'a safe, secure and pedestrian-friendly village environment, with reduced impact from traffic'*. While the results from the traffic Assessment are appreciated, the Parish contends that the 32 two-way trips generated by the proposal would conflict with the overall Vision of the Chalfont St Giles neighbourhood plan and this should bear significant weight against the proposal.

Notwithstanding this, given that it has already been established that the location of the site is unsustainable and that residents are likely to be reliant on private vehicles, it is not unreasonable to assume that the scheme has the potential to generate more than 32 two-way trips. It is therefore considered that this baseline of 32 two-way trips needs to be evaluated prior to the LPA making any decision on the proposed scheme.

The Parish Council concludes that the proposal, by virtue of its location away from local services and facilities is unsustainable, and will therefore not provide units suitable for senior residents, contrary to Housing Policy 1 (b) of the NP and CS29 of the CS.

8. Ecology and Biodiversity

Paragraph 174 of the NPPF requires development proposals to appropriately identify and consider the degree of impact likely to be caused on ecology and biodiversity, and promotes conservation, restoration and enhancement of priority habitats. The application is supported by a Preliminary Ecological Appraisal with Preliminary Roost Assessment, prepared by Focus Ecology Ltd.

Policy CS24 of the CS outlines that the Council will aim to conserve and enhance biodiversity within the District, to ensure safeguards to protected species and *'all sites and networks of habitats of international, national, regional or local importance for wildlife or geology'*.

Most notably, CS24 also states that *'in exceptional circumstances, development outweighs any adverse effect upon the biodiversity of the site and there are no reasonable alternative sites available, replacement habitat of higher quality will be provided through mitigation and/or compensation to achieve a net gain in biodiversity'*.

The report identifies that further bat survey work is required to determine the level of bat activity within the site, and therefore the potential impact arising from the development proposal. Further survey and assessment work must also be undertaken to determine the presence of, and habitat significance for great crested newts. In the absence of this key information, the Parish Council recommends that planning permission is refused.

It is understood that further environmental records are in the process of being undertaken, updated at Buckinghamshire and Milton Keynes Records Centre with a proposed updated Ecological report expected to be submitted at the end of January 2020. Should the LPA choose to accept further reports, the Parish Council reserves the right to provide further comments in response to any addendum documents.

9. Design and Landscape

NP Design Policy 1 (New Development) requires that proposals positively respond to local character zones and reinforces the role of Green Belt policies in establishing the acceptability of development.

The policy also states that development proposals must create a positive relationship between sites and existing built up areas. The policy is explicit in outlining that *'new buildings should reflect the height of existing buildings in the immediate vicinity, and boundary treatments should reflect the immediate area'*.

For the purposes of Design Policy 1, the site adjoins character Zone B, and more specifically, the Established Area of Residential Character H4 (Valentine Way Residential Area), as outlined in the Chiltern District Council Chiltern Townscape Character Assessment Review 2011.

Core Strategy Policy CS20 (Design And Environmental Quality) states that new development within the District must be *'of a high standard of design which reflects and respects the character of the surrounding area and those features which contribute to local distinctiveness'*.

Emerging Local Plan Policy DM LP4 (Homes – Rural Exception Sites) also advises that the development must respect the overall setting, form and character of the settlement and surrounding landscape (criteria 5).

The DAS sets out a number of well-intended Design Principles, however it is clear that these have not been demonstrated in the resultant design and layout, as is explained below.

For example, in relation to Design Principle 1, although the aim of the applicant was to place considerable importance to achieving a *'High standard of design across the site'* it has fallen short both in terms of urban design and architectural style.

Design Principle 2 focuses on access to facilities and services and providing a '3-6 minute cycle ride' to these uses. However, the proposal has clearly taken a pro vehicular approach and has been designed for the car. It does not demonstrate on plan, or anywhere in the proposals, a sustainable or pro pedestrian environment. An integrated pedestrian and cycle movement network and how these routes connect to existing routes should be expected in a design scheme of this scale in 2020. In addition to no clear pedestrian and cycle routes, there is only one area for cycle storage. There is no provision for secure, covered active travel equipment and cycle storage for visitors or for individual homes.

Regarding Design Principle 4, the application promises to *'round off'* the settlement edge, however it does not in and of itself achieve this. It simply fills in one of the historic field boundaries.

Although the text in the DAS claims to do otherwise this has not been demonstrated on plan. Overall the density and massing of the development is considered to be too tight, creating a hard edge onto the landscape and does not knit into the fabric of the existing settlement. An edge of settlement development requires a much looser approach to create an appropriate landscape edge. Assessment of settlement typologies in the historic core of Chalfont St Giles have been explored, but the scheme would have benefited from looking at more rural typologies, distinctive in character, to inform the layout and would result in a more appropriate response.

Throughout the scheme close boarded fencing has been proposed, both onto the public realm within the site and onto the landscape edge. This scenario not creates low quality boundaries that do not wear well over time. A much more robust approach, using high quality materials or native planting are more appropriate. This is inappropriate for sensitive development site, particularly an encroachment into the Green Belt.

Design Principles 5 and 6 seek to *'reinforce hedgerow and historic parish boundary. Creating a soft landscape edge and integrating existing tree groups'*. While the tree groups are reflected in the scheme, the proposed built form has taken away from any enhancements that these landscape enhancements deliver.

Design Principle 7 seeks *'To consider sustainable drainage as an integral part of the design approach'*. This has not been demonstrated anywhere in the design document which would suggest an outdated, engineered approach is intended. There has been a missed opportunity to integrate sustainable drainage, rain gardens and other landscape enhancements into the street scene.

Design Principle 8 seeks to *'Understand and respect key edges and relationship to topography'*, yet none of the plans have contour lines on them or show how the development has responded to the landscape (geology, topography and soils).

The application has underestimated the sensitivities of the site. The Parish Council expects the design proposals for any encroachment beyond the settlement to start with a landscape strategy and outline how this has informed the site. The proposal has addressed the landscape in terms of 'landscaping' and landscape features, rather than adopting a green infrastructure network approach with functional and connected green elements.

The design response to the landscape context is a critical component of the design rationale, especially when the application is proposing to remove some of the designated Green Belt. There should be a substantial argument and demonstration of how the landscape will be conserved and enhanced throughout the proposal. The ecological buffer proposed can only serve as a functional green infrastructure corridor if it can demonstrate its connectivity to surrounding green routes, which is not evident. The Parish Council therefore conclude that that

identified opportunities are very much limited to land inside of the red line boundary and do not show how they integrate into the surrounding landscape.

The submitted scheme is designed with car usage in mind, conflicting with Design Principle 9 which outlines an aspiration for *'a user hierarchy that priorities pedestrian and cyclists'* (also referenced in Design Principle 2).

Design Principle 10 concerns vehicular access and the proposed *'legible 'trunk' and 'branch movement structure'* does not reflect the historic character and settlement pattern of Chalfont St. Giles; this is more akin to a suburban layout. While it is apparent that this proposal is the first phase of an overall masterplan, the turning heads to the east and north are not well designed and there has been no consideration of how these integrate onto the green spaces in terms of contribution to a high-quality public realm. The turning heads present a scheme that appears unfinished and if the second phase is not delivered will create a low-quality public realm.

Overall there is a lack of enclosure onto green spaces, specifically the 'landscape buffer' to the east. What is proposed is not overlooked and has created an alleyway enclosed by close boarded fencing, car parking and uses that do not complement which aims to be an enhanced pedestrian route; It will instead encourage anti-social behaviour along its entirety.

In respect of Design Principle 12, which aspires for *'A place inspired by local character'*, the historic core of Chalfont St Giles is linear in form, as can be seen from the figure ground diagram on page 18 of the DAS. Unfortunately, key characteristics of distinctive architectural features have been omitted from the scheme.

There is no precedent for the provision of three storey buildings in this location which will appear more prominent from the surrounding area, with the potential to impact on the setting of the Chilterns AONB, and further erode the intrinsic openness of the Green Belt. The submission scheme is also based on a Standard House Type pack which the Parish Council considers undermines the rationale for a locally distinctive landscape led design.

There is no mention of how the scheme will address street lighting on the adoptable central spine road and secondary routes. Light pollution would be a significant consideration on an edge of settlement location.

The proposed parking strategy is not acceptable. There is a considerable amount of tandem including three in tandem parking spaces proposed, both on hard standing and in front of garages, which is significantly detrimental to the scheme. Evidence suggests that car users do not use parking spaces when they are intended to be used in this way, the logistics of sequencing trips becomes too onerous and therefore drivers tend to park on the surrounding roads (often with two wheels on the pavement), thus leading to a car dominated street scene and access for pedestrians is further disrupted.

The Parish also notes, that as well as poorly designed parking alongside and in front of most of the houses, there are an unacceptable number of hard standing parking courts, some of which appear to be impossible to access (16-21).

10. Conclusion

The made NP outlines a commitment to the delivery of affordable housing for the benefit of local people, and sustainable growth of the community; however the proposed development fails to accord with the NP, particularly its Key Vision to enable the community to grow stronger socially, whilst also conserving and enhancing the special character of the village and the surrounding rural area. The Parish Council disputes the findings of the Housing Needs Survey and the process under which key data is obtained or omitted.

Insufficient information has been provided to determine the potential impacts on protected species. Additionally, the proposed scheme, by virtue of its design, layout and location beyond the core settlement area and away from services and facilities does not promote a high quality, pedestrian friendly village environment, and will guarantee a total reliance on use of private motor vehicles, to the detriment of both the existing and future residents of the Parish. The proposed expansion will not *'grow the settlement socially'* nor will it promote *'a safe, secure and pedestrian-friendly village environment, with reduced impact from traffic'* contrary to the Vision outlined in the NP.

Having regard to paragraph 11 (d) (i) of the NPPF the impact on the openness of Green Belt and wider landscape character provides a clear reason for refusing the proposed development. Whilst the proposed scheme would provide 100% affordable housing, the need for such a figure is in dispute, and the affordable housing offer does not outweigh the impact arising from such an extensive development of the Green Belt, having regard to the site's poor connectivity with existing services and access to public transport.

The Parish Council concludes that proposal does not constitute very special circumstances which would outweigh the detrimental impacts caused and in accordance with paragraphs 144 and 11 (d) (ii), the adverse impacts of the development proposal would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Chalfont St Giles Parish Council respectfully request that the Local Planning Authority refuse this application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'H Griffiths', with a stylized flourish at the end.

Helen Griffiths
Clerk to Chalfont St Giles Parish Council