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Graham Winwright
Planning Policy Manager
Chiltern and South Bucks District Council
King George V House
King George V Road
Amersham
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Dear Mr Winwright

Sustainability Appraisal for Chiltern and South Bucks District Councils Regulation 18 Green Belt Preferred Options

The purpose of this letter is to highlight for your attention the several errors, omissions and unsubstantiated conclusions contained within the Sustainability Appraisal for Chiltern and South Bucks District Councils Regulation 18 Green Belt Preferred Options, dated September 2017, in the section on Pre-Mitigation Assessment Findings for Area South of Little Chalfont – Option 6.

Errors

- para 4.7.1 refers to the site as "a former golf course". In fact, while the site includes a former golf course it includes large areas of land designated as agricultural, grazing land and open countryside. It is also highly misleading to record that "the eastern area of the option is occupied by a car body shop and civil engineering firm". Honours Yard takes up only a small proportion of the eastern area,

with undeveloped green belt within the site on both sides of the yard, and the whole eastern flank is open to the fields, woods and AONB on the eastern side of Lodge Lane.

- SA2 states that "the option is overall quite (sic) enclosed with limited visual sensitivity, with the exceptions of views likely to be experienced from the footpaths that cross the option" and "Development surrounds the location, whilst vegetation makes up the boundary of the option, meaning that there is scope to contain development within this location." In fact development does NOT surround the location there are NO footpaths that cross the option but nevertheless there are wide stretches of boundary which are open and afford views into the Green Belt, including views from the adjacent AONB.

A site visit or even a cursory glance at Google Earth should have avoided these errors.

- SA4 states "Residents are anticipated to have moderate personal car use." For the reasons that we already pointed out in our response to the previous "consultation" on Sustainability (Annex A to the Initial Consultation (Regulation 18) Incorporating Issues & Option or "Regulation 18 Consultation"), some of which we repeat below in relation to SA9, we disagree with this statement and therefore the ranking of this assessment.

- SA6 and SA7 both use the incorrect (and derogatory) description "scrap yard" . This industrial area is more accurately described in 4.7.1 as a car body shop and civil engineering firm.

- In relation to Transport, SA9 refers to " Chalfont & Latimer Railway Station being within 1km of the option and a regular bus service to Watford and Chesham operates from Amersham Road, with majority (sic) of prospective residents anticipated to be within 400m." and to " The PRoW network around the option is good, offering walking or cycling access into Little Chalfont (and the surrounding countryside)". In fact, as we have pointed out in our previous responses to consultation in relation to the site (Ref 17.4 of our response to the Regulation 18 Consultation) :

- while the station appears to be the key factor in the assessment of the sustainability of the site, the service is already standing room only at peak times and the station car park is often full by 0830 hours; and
- the bus service from the one bus stop on Amersham Road is described as being within 400m for the majority of prospective residents. This claim is surely untrue unless the positioning of the proposed development is to be particularly skewed on the site towards the Amersham Road bus stop;
- Also, there is no PRoW network from the site offering walking or cycling access into Little Chalfont.

- SA11 states "Approximately half of prospective residents are anticipated to be within 1km of a GP surgery. The closest hospital with A&E services is Watford General Hospital, over 11km away at the farthest point, a journey of 45 minutes by public transport. The PRoW network offers good access into the surrounding countryside, with public footpaths running through the centre of the option." With reference to these claims:

- We believe that the word "approximately" is deliberately vague and should be replaced by "less than".
- It should be stated that the reference to 11km to Watford General Hospital compares poorly with the optimal distance of 5km and "target" distance of 8km, and noted that the indication of a 45minute journey by public transport takes no account of the frequency of public transport (see Omissions below).

Omissions

- SA3 correctly notes the "habitats of principal importance present on option"(sic), and to potential "loss of ancient semi-natural (sic) woodland which must be protected as per the NPPF". While we agree that "These woodland areas are likely to have high biodiversity", we consider these woodlands provide important habitat connectivity **not just through the option, but also well beyond**. As we pointed out in our response to Chiltern and South Bucks Local Plan Green Belt Preferred Options, the site not only contains a high spatial priority 'Woodland Priority Habitat Network' (Wildlife Corridor), but it is also part of an extended east/west corridor ensuring migration and gene exchange (source: Forestry Commission England, Strategic Development Team).
- SA6 refers blandly to Grade 3 agricultural land, and does not clarify the uncertainty raised in paragraph 3.24.6 of the January 2016 "Sustainability Appraisal of the Chiltern and South Bucks Local Plan Initial Consultation (Regulation 18) Incorporating Issues and Options " where it is stated that "It is unknown whether this is Grade 3a (which is considered best and most versatile) or Grade 3b land (which is not). As such it is uncertain whether development would lead to loss of best and most versatile land."
- SA9 is headed Transport and Accessibility, but Accessibility is not considered in the Appraisal. Specifically, no reference is made to the inaccessibility of the site. As we have previously identified (in our response to Chiltern and South Bucks Local Plan Green Belt Preferred Options), the site would be exceptionally impermeable to vehicle access because three of the surrounding roads are private. Of the remaining two, Burtons Lane is narrow and inconvenient in places. Lodge Lane is also narrow, especially under the railway bridge, has no pavements, and long steep hills which can ice up in winter on either side of the present (former golf club) access to the site. This icing could prevent traffic flows from the development in hard weather and, worse, access for emergency vehicles.
- In SA9 the bus service to Watford and Chesham from Amersham Road is described positively as being "regular" but no reference is made to the limited frequency of the service (only once an hour to Watford and High Wycombe Mon- Sat, 7am - 7pm). This omission is significant since frequency is listed as a relevant indicator for SEA Objective 9, and again it is disappointing because we have previously pointed out the omission, in Annex A of our response to the Regulation 18 Consultation.

Unsubstantiated Conclusions

As a result of the errors and omissions, we consider that several of the SA Assessments are based on a flawed analysis.

We are particularly disturbed by the failure to correct errors which we highlighted in our previous responses to the Emerging Local Plan consultation. In our view the errors and omissions result in unsound assessments which do not give an accurate or balanced account of the sustainability arguments for and against selection of this site. Furthermore, we consider that too much stress has been placed on the existence of a railway station at Little Chalfont as an argument for the development. Also, inadequate attention has been paid to the inaccessibility of the site and the lack of PRoW to essential amenities, which would inevitably result in heavy car use to and from the site, increasing the chronic road congestion on the A404 and air pollution in the village.

We trust that this Sustainability Appraisal evidence will be corrected and the questionable assessments for this potential site reconsidered, before any recommendations on the development of the site are made.

Gill Roberts
Chairman
Little Chalfont Parish Council

Roger Funk
Chairman
Little Chalfont Community Association