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## **Chalfont St Peter Parish Council (CSPPC)**

### **Chiltern and South Bucks Local Plan 2036 Examination**

#### **Matter 3 - Spatial Strategy**

Issues 1 & 2 – Distribution of Growth and Location of New Development



## Issue 1 – Distribution of Growth

### 1. How did the Councils determine the level of growth between the administrative areas of Chiltern and South Bucks? Does the level of growth proposed in each area reflect the housing need for both authorities?

- 1.1. The HEDNA (2019, **CSBLP 26**) states that there is “an overall minimum housing need of 6,600 dwellings for Chiltern and 8,660 for South Bucks over the 20-year Local Plan period 2016-2036, a combined total of 15,260 dwellings, or 763 dwellings per annum.” The Settlement Capacity Study (2020) highlights that 5,338 homes (housing from all sources) will be delivered in Chiltern over the Plan period, whereas 5,819 homes (housing from all sources) will be delivered in South Bucks over the Plan period. This reveals a disproportionate amount of housing has been allocated to Chiltern. It is assumed that these figures relate to the maximum level of land availability documented in the HELAA (2020, **CSBLP19**). As such, it cannot be considered that the housing figures for either local authorities meet their respective required housing need.
- 1.2. Broad location sites for housing were identified through the HELAA (2020, **CSBLP19**). The Parish Council (PC) considers that the level and distribution of growth has been planned in a reactive manner, as it appears that the distribution of growth was mainly selected based on a bottom-up site led approach focused on the underlying land constraints i.e. a large proportion of Green Belt and AONB lies within the authority boundaries.
- 1.3. In the absence of a Settlement Hierarchy Study (2020), it is unclear as to how the level of growth within each of the principal settlements was allocated. In the South Bucks Authority Monitoring Report (2016-2017) it states that *“the Spatial Strategy of the Core Strategy aims to protect the Green belt, by focusing new development on previously developed land within existing settlements (excluded from the Green belt), with a particular focus on the Principal settlements of Beaconsfield, Gerrards Cross, and, to a lesser extent, Burnham. The Strategy plans for limited additional development in the Secondary settlements and very little new development in the Tertiary and Rural Settlements over the plan period.”* It is however clear that this



hierarchical approach to distributing growth has been omitted from the submitted Local Plan itself.

1.4. With the above in mind, the PC is concerned that a disproportionately high number of homes has been allocated in Chalfont St Peter, as 1,412 homes (20%) of all new homes in Chiltern will be delivered here. For reasons discussed below, Chalfont St Peter is proven to not be a “*a sustainable location*”, and therefore alternative spatial options need to be explored. The scope for identifying sites for intensification has been blatantly overlooked through the HELAA process and should therefore be revisited. Further discussion on this matter can be found at Issue 1 Question 7.

1.5. In addition, it is worth noting that the Settlement Capacity Study (2020) was not listed within the List of Submission Documents, and was all produced after the emerging Local Plan, therefore it is unclear as to how this Study informed the emerging Local Plan.

**2. Paragraphs 8.9-8.10 of the Council’s response to the Inspectors’ Initial Questions states that in exploring options for growth, the Councils focused on:**

- **A more efficient use of land;**
- **Extensions to principal settlements; and**
- **Green Belt release close to train stations.**
- **How has the distribution of housing and economic development proposed in the Plan responded to these development options?**

2.1. The HELAA (2020, **CSBLP19**) explored a range of site sources for inclusion. A key flaw of this approach is the lack of consideration for intensifying housing delivery in already built-up areas.

2.2. Given that Gerrards Cross is defined as a ‘principal settlement’ within the existing South Bucks Core Strategy, it begs the question as to why no extensions have been allocated on land adjacent to Gerrards Cross or included within the Part II Green Belt Assessment (2019), such as Green Belt to the south of Gerrards Cross (contained by the M40 and Fulmer



Road) and land immediately north of Gerrards Cross at Layters Green (the latter of which lies within 2km of Gerrards Cross station).

2.3. Based on the above criteria set by the Inspectors, the PC consider it wholly unjustified for Site SP BP7 (1.10) to have been allocated within the submitted Local Plan, given that the site lies 3.1 miles away from the closest train station at Gerrards Cross (Chiltern railways) and scored moderately overall in the Part II Green Belt Assessment (2019, **CSBLP15.3**)

2.4. It is clear that the Councils' have disregarded logical spatial options such as intensifying existing urban land. The PC considers that extending principal settlements should be examined instead of releasing areas of Green Belt close to railway stations, where, at current, the Councils' do not meet Paragraph 135 a) of the NPPF (2019).

**3. Does the Plan adequately set out an overall strategy for the pattern, scale and quality of development as required by paragraph 20 of the Framework? Is this sufficiently clear to decision-makers, developers and local communities?**

3.1. The Parish Council considers that there is no coherent spatial strategy within the submitted Local Plan, and, as such, the spatial strategy cannot be considered sound. The spatial strategy is essentially bottom up and site led.

3.2. The submitted Local Plan includes policies in each topic Chapter which are referenced as "SP" – Strategic Policy. However, these policies do not clearly set out a spatial strategy as required by Paragraph 20 of the NPPF: For example, the 'Homes Places' policies marked SP only list the site allocations (Policy SP LP1) and the number of pitches and plots for Gypsies, Travellers and Travelling Showpeople (Policy SP LP2). No direction is set out in terms of the distribution of development between places, such as the total housing to be provided in the Plan period or the role of different settlements.



3.3. It is noted by the Parish Council that the Settlement Capacity Study (2020) includes such information in a tabulated format (Figure 3) but it is omitted from the Submitted Plan.

3.4. In addition, although a Key Diagram has been included the submitted Plan, it fails to illustrate the strategic policies in the Plan such as the distribution of development, the scale of development by place, the strategic allocations and the planned strategic infrastructure.

3.5. A key consideration for the emerging Local Plan should also be cross-boundary strategic matters. Given that the emerging Local Plan is allocating 5,725 homes within the Vale of Aylesbury, and in recognition of point 3.4.7 of the emerging Local Plan, which states: *"in recognising the difficulties of meeting all of the above, working with adjacent local plan areas so that any of our needs which cannot be met locally are met as part of sustainable development proposals within the wider housing and economic market areas,"* the PC deems it irresponsible of the Councils' to have not provided a wider-than-Borough map to illustrate how the spatial strategy for the Councils' relates to areas outside the authority boundaries. This would be a particularly useful addition to the emerging Local Plan given that the Buckinghamshire unitary authority will soon come into effect, promising more opportunity for wider-than-Borough joint-working.

**4. Does the Plan identify the Principal Settlements where the Councils have sought to focus development?**

4.1. Please see our response to Q1 above

**5. How did the Councils decide on the scale and level of growth attributed to the towns and villages in the Plan? For example, why do the allocations in the Plan propose significantly more new dwellings in Beaconsfield than Amersham? What was the process and what alternative strategies were considered?**

5.1. Please see our response to Q10 below.

**6. What is the justification for the scale of development proposed on individual sites at Beaconsfield and Chesham? Why does the Plan seek**



**to allocate large, single allocations, rather than several smaller sites in and around the towns?**

6.1. CDC/SBDC should respond to this question.

**7. Is the spatial strategy and distribution of development consistent with paragraph 103 of the Framework which states that the planning system should actively manage patterns of growth and focus significant development in locations which are, or can be made sustainable?**

7.1. Para 103 of the NPPF states that *“significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”*

7.2. As set out in the Parish Council’s previous representations, sites SP BP7 and SP BP8 should not be considered as *“sustainable locations”*, as the combined impacts of both sites developed is estimated to increase the expected travel time on the A413 in both directions.

7.3. Given that the Settlement Capacity Study (2020) has stated that *“while not all facilities are found within the town itself, the wider area including Gerrards Cross functions as one urban area with shared facilities available. These factors suggest that the area should accommodate a significant part of the housing demand of the plan area”*, it is unclear as to why the transport assessment has not taken this comment into account when assessing impacts at Gerrards Cross. For many other settlements, the Phase 3B Modelling Report (June 2018) has provided an accompanying map for each settlement, however this has been omitted for Gerrards Cross. Instead the Phase 3B Modelling Report (June 2018, **CSBLP46**) states that *“the Gerrards Cross area is only slightly impacted in terms of travel time increases with the Local Plan growth scenario in place. This is to be expected as there is a relatively small increase in housing from the draft HELAA sites compared with other areas, and no preferred Green Belt options in the settlement.”* This demonstrates a crucial flaw within the submitted Local Plan’s evidence base, as it is clear that information brought forward is not shared or considered within other evidence base documents. As such, the Plan is not justified, as cumulative effects within the evidence has



clearly not been considered when developing these transport modelling outputs.

**8. What role have the Councils played in the spatial distribution of development in the emerging Vale of Aylesbury Local Plan? Are specific sites identified in the Vale of Aylesbury Local Plan to meet the unmet needs from Chiltern and South Bucks, and if so, are they located in areas close to where the need arises?**

8.1. It is unclear what role the Councils have played in the spatial distribution of development in the emerging Vale of Aylesbury Local Plan.

8.2. Through the ‘Site/Broad Location Assessment’ conducted by the Councils’ in the HELAA (2020, **CSBLP19**), it became apparent that the Council’s housing supply vs. need would lead to a total shortfall of 4,245 homes over the Plan period, as shown in Figure 1. As stated within the Duty to Cooperate Statement (2019, **CSBLP12**), a MoU was agreed between CDC, SBDC and ACDC, by which “AVDC agreed that the Vale of Aylesbury Local Plan would accommodate 5,750 dwellings to 2033 of Chiltern and South Bucks’ objectively assessed housing need, including a proportion of Chiltern and South buck affordable housing need [...]”.

Table 7: Summary of Supply of Housing and Residual Housing Requirement

Source	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	TOTAL in plan period
Completions 16/17 -18/19	632	585	685																		1902
Strategic Allocations				0	0	111	58	230	260	672	791	852	681	590	403	336	187	50	0	0	5221
HELAA capacity				393	461	381	157	116	50	141	125	0	0	0	0	189	38	0	0	0	2051
Small site commitments at 1st April 2019				193	193	193															579
Windfall allowance (from 2022/23 onwards)	0	0	0	0	0	0	86	86	86	86	86	86	86	86	86	86	86	86	86	86	1204
<b>TOTAL CSB SUPPLY</b>	<b>632</b>	<b>585</b>	<b>685</b>	<b>605</b>	<b>673</b>	<b>704</b>	<b>301</b>	<b>432</b>	<b>396</b>	<b>899</b>	<b>1002</b>	<b>938</b>	<b>767</b>	<b>676</b>	<b>489</b>	<b>611</b>	<b>311</b>	<b>136</b>	<b>86</b>	<b>86</b>	<b>11015</b>
Local Plan Requirement (15,260 dwellings 2016-2036)	763	763	763	763	763	763	763	763	763	763	763	763	763	763	763	763	763	763	763	763	15260
Annual Surplus/Shortfall	-131	-178	-78	-158	-90	-59	-462	-331	-367	136	239	175	4	-87	-274	-152	-452	-627	-677	-677	-4245
Cumulative Surplus / Shortfall	-131	-309	-387	-545	-634	-693	-1155	-1486	-1853	-1717	-1478	-1303	-1299	-1386	-1660	-1812	-2264	-2891	-3568	-4245	-4245

Figure 1) HELAA (2020) housing supply vs. housing requirement figures



8.3. More recently, AVDC published its proposed Main Modifications to the VALP in November 2019. Crucially, this version has omitted the criteria in Policy S2 about meeting the unmet housing needs of CDC, SBDC and Wycombe Districts - although the commitment to develop these homes remained in the supporting text. In response, CDC/SBDC submitted a formal objection to this Main Modification on 12 December 2019. This loosening of policy wording creates a clear lack of clarity on the VALP's Spatial Strategy. The PC believes that this wording change will dilute the authorities' respective policy directions on housing delivery and distribution over both Plan periods.

8.4. To evidence the above point, the MoU between CDC/SBDC and AVDC states the following:

*"Once existing completions and commitments are taken into account the emerging Local Plan is proposing (within the plan period to 2033) around:*

- *7,810 homes in/around the Aylesbury Garden Town*
- *850 homes at Buckingham*
- *315 homes at Haddenham*
- *585 homes at Winslow*
- *1,000 homes near Wendover (RAF Halton).*

*The VALP is not proposing additional new employment land beyond what is committed or set out in existing planning applications."*

8.5. This position is later confirmed within the VALP, which states the following:

*"The primary focus of strategic levels of growth and investment will be at Aylesbury, and development at Buckingham, Winslow, Wendover and Haddenham supported by growth at other larger, medium and smaller villages. The strategy also allocates growth at a site adjacent to Milton Keynes which reflects its status as a strategic settlement immediately adjacent to Aylesbury Vale District."*

8.6. The PC is highly concerned that there is no mechanism to ensure that the unmet housing need will be delivered in areas where the unmet need is most required, as the majority of new development will be located at Aylesbury – a considerable distance away from the major urban growth



areas within Chiltern and South Bucks. For this reason, the PC considers that the existing spatial distribution of development promotes unsustainable patterns of growth which are contrary to the NPPF's core presumption in favour of sustainable development (para.11).

**9. Under the heading 'Strategic Context', section 3.6 of the Plan refers to strategic plans and projects which may affect the plan area. Amongst others this includes the Oxford-Cambridge Arc, proposals for a third runway at Heathrow and the Western Rail Link. How have these projects been taken into account as part of the Plan's preparation?**

9.1. CDC/SBDC should respond to this question.

**10. Is the spatial strategy justified? Does it represent an appropriate strategy when considered against the reasonable alternatives available?**

10.1. The Parish Council consider that the spatial strategy is not justified. There has been no thorough consideration of all the reasonable alternatives.

10.2. The Parish Council considers that there is no coherent spatial strategy within the submitted Local Plan, and, as such, the spatial strategy cannot be considered justified or sound. The spatial strategy is essentially bottom up and site led. This means that rather than developing detailed coherent spatial distribution options at the Plan area level and testing those alternatives, the Councils developed spatial options that only considered housing numbers.

10.3. No consideration appears to have been given to a spatial strategy that follows a sequential approach such as concentrating development first within and then adjoining existing urban areas, for example.

10.4. To evidence this point further, there is little evidence to suggest that the Councils' looked at intensifying development in urban cores. On the contrary, as CBC/SBDC stated in the 'CSB Response to Inspectors' Questions' (2019) that *"14.19. The conclusions of CSBLP15.2 were taken into account when drafting policies, but it did not propose a moratorium on green*



*belt release. For example, the assessment [CSBLP15.2] noted that the wedge of Green Belt to the west of the London Fringe (Strategic Zone C) plays a particular role in preventing the coalescence of settlements. This is significant for the districts because Zone C contains the three largest towns of Amersham, Chesham and Beaconsfield - where national policy would typically require the bulk of growth to be situated. However, the towns of Amersham and Chesham have populations in the region of 20,000 while Beaconsfield, which adjoins the Chilterns AONB, is smaller still. As with other smaller settlements, all of their prospects for growth are limited given their tight enclosure by green belt.” This narrative confirms that options for intensification were not adequately assessed in these towns.*

10.5. As evidenced below, the Settlement Capacity Study (2020) asserts that all three aforementioned towns are most suitable to development (emphasis added):

“[...] Amersham is **one of the largest towns within the plan area**. It is also one of the most accessible locations with a good rail service and enjoys a high level of provision of facilities.”

“[...] Chalfont St Peter together with its neighbour Gerrards Cross is one of the more accessible locations in the plan area, enjoying a high level of provision of facilities. While not all facilities are found within the town itself, the wider area including Gerrards Cross functions as one urban area with shared facilities available.”

“Chesham is the **largest town in the plan area** and is a district centre. It is also one of the more accessible locations with a rail service and enjoys a high level of provision of facilities, including some unique to the area such as a theatre. **These factors suggest that it should accommodate a significant part of the housing demand of the plan area.**”

“[...] Beaconsfield is **one of the largest towns within the plan area**. It is also one of the most accessible locations with its own motorway junction, a good rail service and enjoys a high level of provision of facilities. **These factors suggest that it should accommodate a significant part of the housing demand of the plan area.**”



10.6. It therefore defies logic for the Councils to not have considered intensification within the towns of Amersham, Chesham and Beaconsfield. The PC would like to make it clear that CDC/SBDC’s neglect to assess options for intensifications within these areas is wholly unjustified. As shown in the SA Main Report (2019; Figure 2, **CSBLP7**), all spatial options give no mention of intensification of sites, and, nor does the HELAA.

Table 5.1: Joint Local Plan spatial strategy options

Spatial Option	Description
Spatial Option A	Do nothing.
Spatial Option B	Export all unmet housing need to Aylesbury and develop all suitable commitments.
Spatial Option C	Meet partial housing need set out in the Standard Methodology over the plan period (2016-2036) including using commitments and all suitable HELAA sites and exporting remaining unmet housing need to the Vale of Aylesbury.
Spatial Option D	Meet the housing need set out in the Standard Methodology over the plan period (2016-2036) including using all sources and include additional Green Belt Strategic Options releases as necessary (Exceptional Circumstances), and all suitable HELAA sites, and exporting remaining unmet housing need to the Vale of Aylesbury.

Figure 2) SA Main Report (2019) four spatial options

10.7. As shown in Figure 3 below (relevant figures circled), the housing figures for each of these areas is arbitrary, as it is founded on unsound evidence. Given that no regard has been given to the intensification of sites, the decision to release Green Belt sites in Chalfont St Peter and the disproportionately high housing figures allocated to Chalfont St Peter cannot be justified as the spatial strategy does not align with para.35b) of the NPPF. With this in mind, the Plan cannot be considered sound.

10.8. For the reasons above, it cannot be considered that CDC/SBDC have adequately considered all reasonable alternatives, as the baseline evidence is fundamentally flawed.



Housing figures by parish for the period 2016-2036

Parish	Housing total from site allocations	Housing total from other sources	Housing total from all sources
<b>Chiltern District Parishes</b>			
Amersham	95	503	598
Ashley Green	0	41	41
Chalfont St Giles	0	84	84
Chalfont St Peter	552	860	1,412
Chartridge	0	80	80
Chenies	0	33	33
Chesham	500	861	1,361
Chesham Bois	0	54	54
Cholesbury-cum-St Leonards	0	19	19
Coleshill	0	7	7
Great Missenden	0	148	148
Latimer & Ley Hill	0	7	7
Little Chalfont	700	236	936
Little Missenden	300	89	389
Penn	0	94	94
Seer Green	0	54	54
The Lee	0	21	21
<b>South Bucks District Parishes</b>			
Beaconsfield	1,346	529	2,129

Figure 3) Settlement Capacity Study (2020) partial breakdown of housing figures

- 10.9. Furthermore, in relation to the evidence base used to inform the spatial strategy alternatives, the Parish Council notes that it is imperative to the plan-making process that there is a sound evidence base, as outlined in para. 31 of the NPPF which states that the “preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.
- 10.10. The submitted Local Plan is clearly in breach of this, as the Councils’ have neglected to undertake a Heritage Impact Assessment and Landscape Sensitivity Assessment. These key evidence documents develop our understanding of the impact of development proposals on heritage assets and landscape, informing the distribution and scale of development including any potential release of Green Belt land. If these assessments have not been produced, then it is not possible to compare alternative spatial options as the effects are unknown.



## ***Issue 2 – Location of New Development***

### **1. Is it clear to decision-makers, developers and local communities where new housing and economic development will be permitted? Is the Plan effective in this regard?**

1.1. As noted in response to Question 3 above, the submitted Local Plan includes policies in each topic Chapter which are referenced as “SP” – Strategic Policy. However, these policies do not clearly set out a spatial strategy as required by Paragraph 20 of the NPPF where “*strategic policies should set out an overall strategy for the pattern, scale and quality of development*”.

1.2. It is noted by the Parish Council that the Settlement Capacity Study (2020) includes such information in a tabulated format (Figure 3) but it is omitted from the Submitted Plan.

1.3. In addition, although a Key Diagram has been included the submitted Plan, it fails to illustrate the strategic policies in the Plan such as the distribution of development, the scale of development by place, the strategic allocations and the planned strategic infrastructure.

1.4. The Parish Council considers the Plan is not effective in setting out clearly where new housing and economic development will be permitted.

### **2. How would a decision-maker react to a proposal for new housing or economic development within a settlement inset from the Green Belt?**

2.1. The correct protocol for such a decision would be to assess the impact that releasing the site would have on the strategic nature of the Green Belt. In principle, if the site partially consists of Green Belt, it should be outlined within the Part II Green Belt Assessment (**CSBLP15.3**). This decision should be weighed up against the alternative options and should conform with paras.136-138 of the NPPF – namely that the proposal should meet the national policy criteria which requires Green Belt release to constitute as a case for ‘exceptional circumstances’. If this is not the



case, the proposal should be rejected. Where a proposal only includes inset land, decision-makers should pay particular attention as to whether developing that parcel would in any way contain the Green Belt land. If this is not the case, then in theory the site should follow relevant development management policies.

**3. Does the Plan seek to take the same, or a different approach to new development within towns and villages inset from the Green Belt? For example, would a decision-maker consider the principle of development differently if it was located in Beaconsfield, as opposed to Botley and Ley Hill?**

3.1. A different approach has been taken when considering development within Beaconsfield, as opposed to Botley and Ley Hill, as highlighted in Figure 4 (see circled below).

Housing figures by parish for the period 2016-2036

Parish	Housing total from site allocations	Housing total from other sources	Housing total from all sources
<b>Chiltern District Parishes</b>			
Amersham	90	495-585	585-675
Ashley Green	0	48	48
Chalfont St Giles	0	98-107	98-107
Chalfont St Peter	560	713-748	1,273-1,308
Chartridge	0	42	42
Chenies	0	26	26
Chesham	500	776-816	1,276-1,316
Chesham Bois	0	65-66	65-66
Cholesbury-cum-St Leonards	0	24	24
Coleshill	0	14	14
Great Missenden	0	168-191	168-191
Latimer & Ley Hill	0	8	8
Little Chalfont	700	323-332	1,023-1,032
Little Missenden	300	92	392
Penn	0	106	106
Seer Green	0	35	35
The Lee	0	25	25
<b>South Bucks District Parishes</b>			
Beaconsfield	1,600	386-433	1,986-2,033
Burnham	0	318-330	318-330
Denham	0	483-491	483-491
Dorney	0	11	11
Farnham Royal	0	173-181	173-181
Fulmer	0	15	15
Gerrards Cross	0	478-489	478-489
Hedgerley	0	19	19
The Ivers	1,450	396	1,846
Stoke Poges	0	166	166
Taplow	0	431	431
Wexham	0	31	31

Figure 4) Settlement Capacity Study (2020) partial breakdown of housing figures (Latimer and Ley Hill and Beaconsfield circled)

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3.2. As Beaconsfield has long been considered a 'principal settlement' and is noted within the Settlement Capacity Study (2020) as being *"one of the most accessible locations with its own motorway junction, a good rail service and enjoys a high level of provision of facilities. These factors suggest that it should accommodate a significant part of the housing demand of the plan area."* For this reason, the PC consider this to be a sensible approach to distributing growth throughout the Plan area.