



Chiltern and South Bucks Local Plan Examination in Public Consultation form

You should try to support your representation by evidence showing why the plan should be modified. It will be helpful if you also say precisely how you think the plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication.

Where there are groups who share a common view on how they wish to see a plan modified, that group should send a single representation. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Part A – Personal details

For your comments to be submitted to the Inspector, you must provide contact details

Name **Colin Blundel (Planning Officer)**

Address **Chiltern Society, White Hill Centre, White Hill,**

Town **Chesham**

Postcode **HP5 1AG**

Tel: **01494 771250**

Email: **planning@chilternsociety.org.uk**

Organisation: **Chiltern Society**

Part B - Legal Compliance, Soundness and Duty to Co-operate

Plan-Level: Legally Compliant

A Local Plan is considered legal when it is compliant with section 20(5) (a) of the Planning and Compulsory Purchase Act 2004, including:

- Has regard to the National Policy and guidance issued by the Secretary of State.
- Has been prepared in line with Local Development Scheme
Complies with the Town and Country Planning Act (Local Planning) (England) Regs 2012.
- Whether appropriate notifications have been made.
- Whether a Sustainability Appraisal has been done and made public.
- Whether the Plan meets the requirements of the Habitats Directive and the Conservation of Habitats and Species Regulations 2010

Do you consider the Local Plan to be legally compliant?

Yes

No

Please give details of why you consider the Local Plan is/is not legally compliant, including references to relevant legislation, policies and/or regulations

Are you proposing a modification to make the Local Plan legally compliant and/or to strengthen its compliance?

Yes

No

Please set out your suggested modification(s) below: You will need to say why this modification(s) will make the Local Plan legally compliant/strengthen its legal compliance

Plan-Level: Soundness

Is the Local Plan:

- Positively prepared? Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified? An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective? Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy? Enabling the delivery of sustainable development in accordance with the policies in the National Policy Framework.

Do you believe this plan meets the tests of Soundness?

Yes

No

Please give details of why you consider this Local Plan is/is not sound, include references to relevant legislation, policies and/or regulations.

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.

Our supporters are passionate about the protection of the Chilterns, which is a special area of landscape within easy travelling distance of several towns and the City of London. Much of the area is classified as both AONB and Green Belt and should receive extensive protection under the national policies in the National Planning Policy Framework (NPPF). It is essential that planning policies are considered across local authority boundaries to co-ordinate protection of this special area. The Plan does not give the Chilterns sufficient protection and, therefore the Society objects to the overall plan.

The whole of the Chilterns is currently under intense pressure for new development, being located between London and the proposed Oxford-Cambridge Arc. This pressure must be resisted. The two Councils are in a very special position to resist any incursion into the London Green Belt simply to meet assessed housing need which is assessed using a national formula and pays no regard to the ability of an area to meet that need. The situation is particularly acute in the Chilterns because, apart from Aylesbury Vale District Council, the other adjoining authorities are, similarly, areas constrained by large areas of Green Belt or AONB. Chilterns and South Bucks has the largest area of both and there are, in our view, no exceptional circumstances under the NPPF to justify any significant incursion into recognised GB and AONB areas given that housing need alone is not an exceptional circumstance.

This point is particularly significant given that the new Planning Authority is to be Bucks CC area as a whole so that applying NPPF and GB and AONB protections to the new Council area would allow

scope to identify sites within the rest of the County area to meet the Council's overall housing need, including those currently applicable to the Chiltern and South Bucks authorities.

As drafted, the plan is unsound because it aims to meet the housing need by proposing 5,200 homes within areas to be removed from the Green Belt. This is an excessive land take in such a highly sensitive location and appears to be justified mainly on housing need. There is not sufficient evidence to demonstrate that exceptional circumstances exist for taking this much land out of the Green Belt. The key Green Belt characteristics of openness and permanence must be respected.

The plan needs to be revised to consider whether there are less damaging sites that were not brought forward through the 'call for sites' and whether there is scope for higher density developments on brownfield sites and in town centres.

The NPPF, under section 11, makes provision for Councils to not fully meet their objectively assessed need (OAN) in situations where there is Green Belt and AONB in the locality.

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Footnote 6 confirms that these clauses relate to Green Belt and AONB.

It is clear that these clauses must apply to the situation that exists across the Chilterns, including the area covered by the Plan.

We urge the Councils to review the overall development approach in the plan to avoid unacceptable damage to a nationally important landscape and a significant part of the Green Belt.

As drafted, the overall plan is unsound.

Are you proposing any modifications to strengthen the Plan's ability meet this test of soundness?

Yes

No

Please specify how you would modify this policy to improve its alignment to this test of soundness.

Specific modifications are recommended in relation to individual policies in the sections below.

Duty to Co-operate

Do you consider the Local Plan to have met the requirements of the Duty to Co-operate in accordance with section 110 of Localism Act 2011 and section 33A of the Planning and Compulsory Purchase Act 2004?

Please note: any non-compliance with the Duty to Co-operate is incapable of modification at examination

Yes

No

Please give details of why you consider the Local Plan has met/not met the requirements of the Duty to Co-operate.

B: Tests of Soundness at Policy Level

Policy Number: Para 3.5.7

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

This paragraph is not effective in that it does not give any indication of how Green Belt boundaries would be strengthened when they are altered during the plan process. It is more likely that changes would lead to reduced protections.

The text does not supply any detail about potential developments adjacent to the Slough boundary and potential implications for the Green Belt in that location and elsewhere in the Districts. The Society has not had the opportunity to comment on potential development sites that may be required for the expansion of Slough.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The text should be modified to clarify what is meant by strengthening the Green Belt boundary.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number:

Para 3.5.8

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

As worded, this paragraph is inconsistent with the local authority's duty under Section 85 of the Countryside and Rights of Way Act 2000 to "conserve and enhance" the natural beauty of the AONB. This is important because it implies a more active approach to managing the landscape of the AONB in the long term.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

Amend the text to read –

"To conserve and enhance our treasured environments...."

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: SP LP1

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary

strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. *The definition of Consistent with the NPPF is:*

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

The Chiltern Society objects to the high proportion of new homes being proposed in the Green Belt and the Chilterns AONB. We consider that this is insufficiently justified and inconsistent with the NPPF.

In particular, the Council's approach is inconsistent with paragraph 11 of the NPPF which sets out the presumption in favour of sustainable development.

In relation to plan making, the paragraph includes the following –

"b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

Footnote 6 to the paragraph confirms that these potential exceptions should apply in Green Belts and AONBs.

Whilst we recognise that the Councils have followed current Government guidance on assessing Objectively Assessed Need (OAN), we consider that they have failed to consider the requirements of sub-sections i and ii above.

Chilterns and South Bucks are highly constrained Districts due to large areas being within the

Green Belt and AONB. In our view, this is just the type of area footnote 6 is designed to address.

The evidence suggests that the sites have been identified through a 'call for sites', rather than an assessment of sites across the whole Plan area. Many of the sites chosen are in the Green Belt and/or AONB. Most are located on the edge of existing settlements in locations which meet several of the 5 purposes of Green Belt designation, and in particular, restricting development encroaching into open countryside.

We are aware that adjoining districts are also significantly constrained, so apart from Aylesbury Vale, there are limited opportunities for unmet need to be located outside the District.

Therefore, sub-section i must be applied in this case and development in the Green Belt and AONB significantly reduced from the current levels, resulting in a reduction in the total number of dwellings below the OAN. We consider this could be addressed by considering non-designated sites beyond the sites in the 'call for sites' and by looking at potentially increasing development on brownfield sites, including some increased density in the urban areas.

The loss of large areas of open countryside within the Chilterns landscape would have a significant detrimental effect on the area both in terms of the loss of Green Belt and potential increases in traffic and overstretching of water resources to the detriment of the Chilterns Chalk Streams.

When sub-section ii is applied, we consider that the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The need for housing on its own does not create an exceptional circumstance and would certainly not, in our view, outweigh the harm to the Green Belt, the Chilterns AONB and the AONB's setting.

To include these sites the Councils need to demonstrate that for the Green Belt the sites don't meet the 5 Green Belt purposes and for the AONB the tests in paragraph 172 of the NPPF must be met.

National Planning Policy Guidance published on 21 July 2019 reaffirms the Government's approach to protecting AONBs by restricting new housing below the OAN. The guidance is worded as follows –

"The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated".

(Paragraph: 041 Reference ID: 8-041-20190721)

The allocation of housing in the Green Belt and AONB is therefore insufficiently justified, is ineffective and contrary to national planning policy.

The whole plan is, therefore considered unsound in this respect.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The Council's approach to development in the Green Belt and AONB need to be comprehensively reviewed so as to reduce the significant threat to the Chilterns countryside. This review needs to take into account the requirements of the NPPF and NPPG.

B: Tests of Soundness at Policy Level

Policy Number:

DM LP2

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

We welcome affordable homes as part of all new developments. 40% is a reasonable figure, but affordable must be defined.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

Define the Council's definition of affordable.

4. *The definition of Consistent with the NPPF is:*

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number:

DM LP3

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

We welcome affordable homes as part of all new developments. 40% is a reasonable figure, but affordable must be defined.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

Define the Council's definition of affordable.

4. *The definition of Consistent with the NPPF is:*

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number:

DM CP6

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

The Plan is not effective in that it does not make provision for the Misbourne Greenway.

The 'Misbourne Greenway' is a proposed path for walkers and cyclists, between Wendover and the Chalfonts, one section of a route between Birmingham and London within the HS2 corridor.

The Chiltern Society involvement began in June 2017 when members of the Society HS2 group attended a Workshop event at Misbourne Abbey, where outlines of a dozen or so 'Additional Projects' were presented - designed "to further integrate the scheme [HS2] into the AONB landscape - over and above the mitigation identified in the Environmental Statement/ pursuant to the Hybrid Act." The Chilterns AONB review group had been assured a sum of £3m to take some of these projects forward.

In order that the project progresses during the Plan period, the Society would like to see a reference to the Councils supporting the proposals and safeguarding the route from development.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

5. Misbourne Greenway

Creation of a new cycleway linking Wendover to Uxbridge. Safeguarding of the route from development and providing associated leisure facilities.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number:

DM NP1

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

The AONB policy largely follows the model policy proposed by the Chilterns Conservation Board. However, the policy has been weakened in bullet point 1 by the addition of 'where possible' This should be removed to ensure that development conserves and enhance in accordance with the CROW Act 2000.

Bullets 2 and 3 only require developments to 'have regard' to the AONB Management Plan and the Chilterns Buildings Design Guide. These need to be strengthening in order to increase the protection for the AONB and to encourage good design in all circumstances.

The clause in the model policy relating to economic, social and environmental wellbeing should be added in to encourage any developments in the AONB to be sustainable.

The final paragraph is inconsistent with the NPPF paragraph 172 in relation to major developments in the AONB. This paragraph needs to be negatively worded as follows – "Planning permission should be refused for major development other than in exceptional circumstances.....". This would give stronger protection from major development in the AONB.

The wording could be altered to include reference to protecting the setting of the AONB. This is important in this plan because a number of the proposed sites are immediately adjacent, but outside, the AONB boundary.

Whilst the NPPF does not define 'major development' in relation to AONBs, we would like the local plan to include a definition that can be used locally in order to ensure a consistent approach to protecting the AONB. For this purpose, we suggest that any development of 10 or more houses

should be treated as major development. The Chilterns AONB is a very complex and sensitive landscape where developments of this scale could have a significant effect.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The Plan should use the Chilterns Conservation Board's model policy which is as follows –

Policy x The Chilterns Area of Outstanding Natural Beauty

Permission for major developments in the Chilterns Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it:

- a. conserves and enhances the Chilterns AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation;
- b. is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment;
- c. meets the aims of the statutory Chilterns AONB Management Plan, making practical and financial contributions towards management plan delivery as appropriate;
- d. complies with the Chilterns Building Design Guide and technical notes by being of high quality design which respects the natural beauty of the Chilterns, its traditional built character and reinforces the sense of place and local character; and
- e. avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.

Final paragraph -

"There is a presumption against major development in the AONB unless it can be demonstrated that there are exceptional circumstances....." should be replaced with "Planning permission should be refused for major development other than in exceptional circumstances....."

A definition of 'major development' should be agreed and incorporated into the policy or the supporting text for clarity.

B: Tests of Soundness at Policy Level

Policy Number: DM NP6

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

We consider that this policy is not effective in that it does not recognise the international importance of the Chilterns chalk streams. These are very sensitive environments suffering low flows as a result of over-abstraction within the catchment. They are also very sensitive to increased run-off from new developments which can lead to deposition of silt and degradation of important habitats.

The policy should recognise the importance of rivers such as the Chess and Misbourne and that the Chilterns Chalk Stream Project should be consulted over any developments that might affect these watercourses.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

Add a reference to the importance of the Chilterns Chalk Streams into the bullet points within the policy.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: DM NP7

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

We consider that this policy is not positively prepared. It is worded so as to avoid harm to the existing culverts under Chesham Town Centre rather than looking for opportunities to remove the culverts to increase flood protection and provide an additional amenity for the town. The removal of the culverts should be part of a Masterplan as proposed by the Chesham Renaissance.

A local example of a culvert that has been removed is at the Wycombe Retail Park.

The results of a low flow investigation by Thames Water on behalf of the Environment Agency should be incorporated into the plan.

Water quality is an essential element in conserving the local ecology of the chalk streams. Run-off would need to be managed at source through SuDs schemes to avoid contaminated run-off entering the watercourses.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

This needs to be reviewed as part of a wider review of the development strategy for Chesham.

The Plan should incorporate the Chesham Masterplan, concentrating development in the town centre area and addressing flood alleviation measures in a sustainable manner.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: SP PP1

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

The Chiltern Society objects to the high proportion of new homes being proposed in the Green Belt and the Chilterns AONB. We consider that this is insufficiently justified and inconsistent with the NPPF.

In particular, the Council's approach is inconsistent with paragraph 11 of the NPPF which sets out the presumption in favour of sustainable development.

In relation to plan making, the paragraph includes the following –

"b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

Footnote 6 to the paragraph confirms that these potential exceptions should apply in Green Belts and AONBs.

Whilst we recognise that the Councils have followed current Government guidance on assessing Objectively Assessed Need (OAN), we consider that they have failed to consider the requirements of sub-sections i and ii above.

Chilterns and South Bucks are highly constrained Districts due to large areas being within the Green Belt. In our view, this is just the type of area footnote 6 is designed to address.

The evidence suggests that the sites have been identified through a 'call for sites', rather than an assessment of sites across the whole Plan area. Many of the sites chosen are in the Green Belt. Most are located on the edge of existing settlements in locations which meet several of the 5 purposes of Green Belt designation, and in particular, restricting development encroaching into open countryside.

We are aware that adjoining districts are also significantly constrained, so apart from Aylesbury Vale, there are limited opportunities for unmet need to be located outside the District.

Therefore, sub-section i must be applied in this case and development in the Green Belt significantly reduced from the current levels, resulting in a reduction in the total number of dwellings below the OAN. We consider this could be addressed by considering non-designated sites beyond the sites in the 'call for sites' and by looking at potentially increasing development on brownfield sites, including some increased density in the urban areas.

The loss of large areas of open countryside within the Chilterns landscape would have a significant detrimental effect on the area both in terms of the loss of Green Belt and potential increases in traffic and overstretching of water resources to the detriment of the Chilterns Chalk Streams.

When sub-section ii is applied, we consider that the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The need for housing on its own does not create an exceptional circumstance and would certainly not, in our view, outweigh the harm to the Green Belt, the Chilterns AONB and the AONB's setting.

To include these sites the Councils need to demonstrate that for the Green Belt the sites don't meet the 5 Green Belt purposes and for the AONB the tests in paragraph 172 of the NPPF must be met.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The overall strategy in relation to housing in the Green Belt needs to be reviewed to reduce the significant threat of damage to the Chilterns countryside.

The overall number of houses and the area of Green Belt to be released must be reviewed in relation to the requirement of the NPPF and NPPG.

B: Tests of Soundness at Policy Level

Policy Number:

DM PP1

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

The villages identified for infilling within the Green Belt are all within the Chiltern Society Area and are traditional Chilterns villages.

Some are located not far from other developments within the plan, with a net cumulative effect on Green Belt, AONB setting, traffic, water supply, sewerage, biodiversity, carbon footprint etc. This is particularly true when combined with other large developments planned in Wycombe District Council e.g. Gomm Valley, Abbey Barn. The policy needs to develop mechanisms for assessing cumulative impacts arising as a result of a number of developments in close proximity.

Whilst infilling in these villages may be acceptable in some cases, great care needs to be taken with the design of new dwellings. The emphasis should be on developing smaller, affordable housing, with suitable designs and landscaping schemes to provide an enhancement to the local environment. Designs should be bespoke to their location rather than using 'off the peg' standard house designs. The test for planning applications should be whether the design is good enough to approve.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The policy should be amended to make reference to high quality design and to the need for housing to be affordable.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: SP BP2

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

The Society objects to this allocation because it would lead to a loss of open Green Belt land on the edge of Chesham.

The Exceptional Circumstances Report assessed the site and concluded that the benefits of the development clearly outweighed the harm.

The Society disagrees with this assessment as we consider the development would have a significant impact on the openness and permanence of the Green Belt. In particular, the Green Belt makes a significant contribution to reducing urban sprawl and preventing the encroachment of open countryside.

The justification for the allocation relies very heavily on incorporating mitigation measures to make it acceptable. The conclusion states that the impacts on the Green Belt can be mitigated. With the most significant impact being the loss of openness, we do not see how this could be mitigated

through the development. The conclusion seems to suggest the Green Belt is a landscape and biodiversity designation rather than a mechanism for protecting the openness of the countryside.

We do not consider that the evidence exists to demonstrate exceptional circumstances for removing the site from the Green Belt. The need for housing is not, on its own, an exceptional circumstance, particularly as there is a significant alternative option within the town.

The Chesham Renaissance have developed a Masterplan to provide 450 homes within the Chesham Town Centre. This could provide new homes in a highly sustainable location close to public transport interchanges. Works could also be undertaken to enhance the amenity of the town centre by removing the culvert from the Vale Brook.

Developing a site with a high density within the town centre will enable this site to be removed from the plan, thus protecting both the Green Belt and the setting of the AONB.

The development would lead to more traffic passing through the Air Quality Management Zone on Berkhamsted Road in Chesham. We question whether residents would cycle from this site due to the poor air quality and the hilly terrain. A development within walking distance of the town centre/ station would be preferable. We, therefore, consider that this proposal is unacceptable on sustainability grounds.

The site would be in the setting of the AONB and would bring the developed area of the town much further out into the countryside. As well as potential visual impacts on the AONB it would conflict with the aim of the Green Belt to prevent encroachment into open countryside.

It is unclear from the Local Plan why the Chesham Masterplan has been ignored in favour of this site.

We recommend that this site is removed from the Plan and the development strategy for Chesham revised.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The development strategy for Chesham needs to be fundamentally reviewed and should incorporate the recommendations of the Chesham Masterplan, moving development to a more sustainable location within the town centre.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. *The definition of Consistent with the NPPF is:*

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: SP BP4

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

The Society objects to the inclusion of this site because it currently provides a green buffer between the town and the bypass.

It is entirely located within the AONB and the Green Belt and is immediately adjacent to the River Misbourne, which is a sensitive chalk stream. The allocation should also be considered unsound due to potential impacts on local ecology.

It is unclear from the plan why the Council consider there are exceptional circumstances for this development in the AONB or why its development is considered to be in the public interest. Given the generally small scale development in the surrounding area, this could be considered to be a major development and therefore subject to the tests in paragraph 172 of the NPPF.

There is no evidence that the Council has fully considered options outside the AONB.

Even if this is not considered to be major development, the Council is required to give great

weight to the AONB. This location has a public footpath alongside the River Misbourne and views towards rising open land to the south. It currently makes a positive contribution to this part of the AONB.

Having reviewed the Exceptional Circumstances Report, we are not convinced that the Council can demonstrate 'exceptional circumstances' for removing this land from the Green Belt.

It is an area of attractive open countryside close to the town and alongside the River Misbourne. It makes a positive contribution to retaining open countryside and protecting it from development. It also backs onto open countryside, which rises up above the town.

We are not convinced that the benefits of housing here would clearly outweigh the harm to the Green Belt, so exceptional circumstances do not exist.

We would wish to see this site removed from the Plan on both AONB and Green Belt grounds.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

This site should be removed from the plan due to harm to the Green Belt and AONB.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number:

SP BP5

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

The Society objects to the inclusion of this site because it currently provides a green buffer between the historic town and the bypass.

It is entirely located within the AONB and the Green Belt.

The SA acknowledges at para N56 that "Area South East of Whielden Street, Amersham Old Town has chalk grassland present at the option which promotes high biodiversity of insects and butterflies". The Society objects to development taking place on chalk grassland habitats.

It is unclear from the plan why the Council consider there are exceptional circumstances for this development in the AONB or why its development is considered to be in the public interest. Given the generally small scale development in the surrounding area, this could be considered to be a major development and therefore subject to the tests in paragraph 172 of the NPPF.

There is no evidence that the Council has fully considered options outside the AONB.

Even if this is not considered to be major development, the Council is required to give great weight to the AONB. This location currently makes a positive contribution to this part of the AONB.

Having reviewed the Exceptional Circumstances Report in relation to the Green Belt, we are not convinced that the Council can demonstrate 'exceptional circumstances' for removing this land from the Green Belt. The land makes a contribution to preventing urban sprawl and protecting open countryside from development. The Exceptional Circumstances Report makes no reference to the site's location in an AONB.

With the site sloping upwards from the back of adjacent properties, the new dwellings would be raised up above the existing ones and could have a significant visual impact within the surrounding area.

We would wish to see this site removed from the Plan on both AONB and Green Belt grounds.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

This site should be removed from the plan due to harm to the Green Belt and AONB, and due to ecological impacts, particularly in relation to chalk grassland.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: SP BP6

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Having reviewed the Exceptional Circumstances Report, the Society's main concerns relate to the loss of openness of the countryside in the Green Belt and the outward sprawl of a built up area. The assessment states that the site performs weakly in these respects. We disagree with this and our view is that the site contributes strongly to the openness and permanence of the Green Belt. The site also helps to prevent the merging of adjacent settlements.

We consider that, on its own, housing need does not create an exceptional circumstance for altering the Green Belt boundary.

On balance, we do not consider that the harm to the Green Belt is clearly outweighed by the need for additional housing. There is insufficient evidence that the site is not performing against the 5 purposes of the Green Belt.

The allocation of this site would, therefore, conflict with national planning policy.

Lodge Lane forms the boundary of the AONB and has its own rural character. Any development that did take place would need to incorporate measures to conserve and enhance the character of the lane to protect the setting of the AONB.

We consider that the scale of this release should be reviewed to reduce impacts on the openness of the Green Belt and the encroachment of development into the Chilterns countryside.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The scale of this site should be reviewed so that the impact on the openness of the Green Belt is significantly reduced.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. *The definition of Consistent with the NPPF is:*

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: SP BP8

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Having reviewed the Exceptional Circumstances Report, the Society's main concerns relate to the loss of openness of the countryside in the Green Belt and the outward sprawl of a built up area. The assessment states that the site performs weakly in these respects. We disagree with this and our view is that the site contributes strongly to the openness and permanence of the Green Belt.

We consider that, on its own, housing need does not create an exceptional circumstance for altering the Green Belt boundary.

On balance, we do not consider that the harm to the Green Belt is clearly outweighed by the need for additional housing.

The allocation of this site would, therefore, conflict with national planning policy.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The scale of this site should be reviewed so that the impact on the openness of the Green Belt is significantly reduced.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. *The definition of Consistent with the NPPF is:*

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: SP BP9

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

The Society objects to the scale of the Green Belt release proposed to the south and east of Beaconsfield.

This land is open undeveloped land which clearly meets the 5 purposes for Green Belt designation.

Having reviewed the Exceptional Circumstances Report, we consider that there is insufficient evidence to demonstrate exceptional circumstances for removing land from the Green Belt.

In particular, we have concerns that the development would have a significant impact on the openness and permanence of the Green Belt. The development would conflict with the purposes of the Green Belt, particularly in relation to preventing outward sprawl and safeguarding the countryside from encroachment. We disagree with the Council's assessment that the site would make little contribution to preventing neighbouring towns merging.

The land is open countryside that forms part of the Chilterns. Developing this land would remove

the spaces between settlements, bringing the development much closer to Seer Green and Jordans. This area of countryside provides an important area for informal recreation on the edge of the town.

When these impacts on the Green Belt and the overall scale of the development are added up there would be a significant negative impact on the Green Belt, which would not be outweighed by the benefits of the 1600 houses proposed.

The proposal should be significantly scaled down and space allowed for a significant green infrastructure buffers between the development and the open countryside.

There is no evidence that alternative brownfield sites have been considered within the local area that could help to reduce the need for such a large urban extension.

We have concerns about the sustainability of the development, particularly because it would create significant additional traffic in a very busy area and it would be too far from the local railway station. Brownfield sites closer to the town centre should be assessed first as they would be likely to have better sustainability credentials. Development within the town could also be considered at a higher density and with some buildings of more than 2 storeys.

This development appears to be designed to have easy access to the motorway and would lead to increased congestion in the town and on the motorway. We do not consider that it can be a sustainable development due to potential environmental impacts on the local landscape and increasing traffic and air pollution.

The proposed new business park would include buildings of a large scale that would have a significant negative impact on the openness of the Green Belt.

In conclusion, this development is much too large and the development approach to Beaconsfield should be re-thought to reduce negative impacts on the Chilterns countryside.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The scale of the development should be reassessed to substantially reduce the area to be removed from the Green Belt and therefore the number of houses proposed.

The scale of the business park development should be reviewed.

The policy for Beaconsfield should include more housing on brownfield sites which were listed on the Brownfield Sites Register or other opportunities within the urban area.

The sustainability of the proposed development needs to be reviewed.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. *The definition of Consistent with the NPPF is:*

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number:

Sustainability Appraisal – page xxix – N87

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

The Society is very concerned about impacts on the wider environment as a result of a 21% increase in the carbon footprint across the two Districts.

For the plan to meet the social, economic and environmental roles of sustainability, as set out in the NPPF, much stronger and clearer actions must be incorporated to mitigate climate change. This issue needs to be fully addressed for the whole plan and for each individual site proposal.

Such a large increase in the carbon footprint does not, in our view, comply with national planning policy relating to achieving sustainable development.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

The plan needs to incorporate additional measures at a plan-wide and site level to reduce the increase in the carbon footprint well below 21%.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to

improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. *The definition of Consistent with the NPPF is:*

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

B: Tests of Soundness at Policy Level

Policy Number: Sustainability Appraisal – page xxix – N89

Please fill in the forms below if you believe this policy does not meet the four tests of Soundness; positively prepared, justified, effective and compliant with the National Planning Policy Framework Feb 2019

1. The definition of Positively Prepared is:

Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development

If you do not believe this policy to be positively prepared, please explain why

The Sustainability Appraisal acknowledges that there would be likely to be significant effects on the landscape of the District as a result of new development.
Given the sensitivity of many of the sites proposed, we would like to see the plan set out positive mitigation measures for each of the proposed sites which would enhance the Green Belt, the AONB and its setting.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

Mitigation measures should be incorporated into proposals to seek to make developments more sustainable in terms of landscape impacts.

2. The definition of Justified is:

An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

If you do not believe this policy to be justified, please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

3. The definition of Effective is:

Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

If you do not believe this policy to be effective, please explain why.

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

4. The definition of Consistent with the NPPF is:

Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

If you do not believe this policy is consistent with the National Planning Policy Framework Feb 2019 please explain why

Please specify as precisely and succinctly as possible how you would modify this policy to improve its alignment to this test of soundness.

Part D - Attendance at the EIP

If your representation is proposing a modification(s), do you consider it necessary to participate at the examination in public?

Please note attendance at the examination in public is at the discretion of the appointed inspector

Yes

No

If you wish to participate at the examination in public, please outline why you consider this to be necessary (please be as precise and succinct as possible)

There are a number of issues in the plan relating to the AONB and Green Belt, which specifically impact on the Chilterns. We would like to give evidence in relation to AONB and Green Belt policy and a number of the sites proposed for allocation.

Part D Supporting Information

If you wish to attach any formal evidence, maps or PDFs please ensure they are clearly marked with the Policy-Level number where required.

Part E – Data Protection and Signature

In submitting comments to this consultation we are required, under the Town and Country Planning (Local Planning) (England) Regulations 2012, to notify you when the independent examination will take place. We will use the contact details you have provided to do this.

Please note: at the end of the consultation period all comments will be made public and will be submitted to the Secretary of State along with the Local Plan and other relevant supporting documents. Your comments and name will be published but other personal information will remain confidential.

Your comments will be reviewed by the independent Planning Inspector appointed by the Secretary of State to carry out the Examination in Public. You may be invited to discuss your comments at the Examination in Public at the discretion of the Inspector.

In line with General Data Protection Regulations (2018), your details are stored on a secure system and are used only for the purposes of consultation for the Local Plan and associated documents.

Your details will be stored until such a time that the Local Plan has been adopted. If you do not wish to receive further updates from the Council in relation to the Local Plan, please email us.

Please tick below to indicate you have read this notice.