

3 June 2018

Planning Department
Chiltern District Council
King George V Avenue
Amersham
Bucks HP6 5AW

(by email: planning-comments@chiltern.gov.uk)

Dear Sir/Madam,

Re: Planning Application CH/2018/0659/OA (99 Dwellings off Asheridge Road Chesham)

We are writing to **object** to the above Planning Application, proposing the development of the site SW off Asheridge Road adjacent to Darvell Drive described as seeking "*to provide up to 99 dwellings (matters to be considered at this stage: access)*".

The Brown Not Green (BNG) campaign is a local organisation representing circa 1,800 local people founded primarily in response to proposals for removing land at Lye Green NE of Chesham from Green Belt designation for large scale housing development as part of the Emerging Local Plan proposals. Our organisation fundamentally believes that brownfield land should be developed for local housing provision first, before green field sites are considered and that Green Belt sites should then only be the last resort for housing provision but only if very special circumstances can be demonstrated.

As Chairman of BNG, I write to register our opposition to the above planning application because:

- The land is designated Green Belt which is a development constraint policy of national importance where the National Planning Policy Framework (NPPF) affirms that such proposed development is inappropriate.
- In order for inappropriate development to be undertaken on Green Belt land, the NPPF requires the applicant to demonstrate "very special circumstances" exist and the Supporting Statement accompanying the application fails to justify sufficient circumstances to outweigh the harm to the openness of the area at the site.
- The land is also designated within the Chilterns Area of Outstanding Natural Beauty (AONB). Under the Countryside and Rights of Way Act 2000 (CROW Act), Chiltern District Council, as the relevant local authority, must make sure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of the AONB. The Council should at least consult Natural England on this application before approving such a proposal but the LPA should itself also consider the effects from such a significant development not just on the site itself but the views across the wider valley (also in the AONB) and from within the AONB too.

- We also feel the application should be refused on the grounds of prematurity given the sensitive nature of this site and the consideration being given to many other sites for housing that are emerging in the new Local Plan as well as the continuing work currently being undertaken to quantify the OAN at this time. The NPPF is also itself under review with the final version expected shortly and whilst draft revisions of the new NPPF do not suggest there will be any loosening of Green Belt policy, it may be best to await final guidance.

BNG also wish to question the general status of the application which as described is unclear. The Council website recites the application as being an outline application, "*to provide up to 99 dwellings (matters to be considered at this stage: access)*".

Access is a reserved matter yet Article 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, asserts that an application for approval of Reserved Matters should only be made after an outline planning application has been approved.

No previous outline planning application appears to have been made. Therefore, this application should be treated as a full Outline Application and should not just be confined to consider the reserved matter of access. As such all aspects of the whole development proposal normally considered at an outline application must also be considered.


However, access is a very important issue and given the applicant has raised the issue, then we feel it is only appropriate for us to direct the LPA to the fact that the access to the site is wholly inadequate. With up to 99 homes and 200+ people, and all the associated cars and traffic that would be generated by this development, this application would certainly have a significant adverse impact on the local road network.

At present the site appears to only have one access point, namely onto Asheridge Road through a farm gate. At this point the road narrows and the speed limit reduces from 40mph to 30mph and visibility is limited due to the narrow width of the road (a single car width) as well as the well established high hedgerows that will hinder sight lines to provide a safe access.

There appears to be no other access off Darvell Drive which itself is unlikely to be able to accommodate improved vehicular access. Further along Asheridge Road, the highway is busier due to the adjacent well established commercial activities with further new housing being proposed nearby too. However, the road is effectively narrowed by the numbers of parked cars in Asheridge Road at all hours but particularly during the day and as such the general access to the site is already severely compromised.

BNG see many similarities in terms of the issues constraining development at this site with those being proposed in the emerging Local Plan for the Green Belt site at Lye Green and cannot see that such a proposal is justified or passes the test of "very special circumstances" to warrant a departure from the current adopted Local Plan policies. Accordingly, for all the reasons we have set out, we would request that the Council **refuse** this application.

Yours faithfully


Phillip Plato DipSurv FInstD MRICS
Chairman – Brown Not Green Chesham Ltd