

Planning Department (by email: planning-comments@chiltern.gov.uk)
Chiltern District Council
King George V Avenue
Amersham
HP6 5AW

26 May 2018

Dear Sir/Madam,

Planning Application CH/2018/0659/OA (99 Dwellings of Asheridge Road)

We are writing to object to the above referenced Planning Application, regarding the development of the site off Asheridge Road “to provide up to 99 dwellings (matters to be considered at this stage: access)”.

The Campaign to Protect Rural England Buckinghamshire branch (CPRE Bucks), as a long standing charity, has a role to protect the countryside from developments that do not meet acceptable planning guidelines.

We would like to register CPRE Bucks’ opposition to the above planning application because:

- The land is designated Green Belt
- The land is also AONB
- The Emerging Local Plan demonstrates an adequate 5-year supply of housing, so this site (and the sacrifice of Green Belt/AONB land) is not necessary or justified.

These points are expanded below, but before doing so, we wish to point out a matter of procedure.

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

No previous outline planning application has been made. Therefore, according to the legislation, this application must be treated as a full Outline Application and not just the Reserved Matter of access. In other words, all aspects of the whole development proposal normally considered at an outline application must be considered.

Chair
Stan Jones OBE

Registered charity
number 1163356
Company number 9186100

We would also point out at this stage that the Planning Statement submitted by the applicant has many erroneous and misleading statements. We will not list them all because we believe that is unnecessary; this application should be rejected simply for the reasons set out below.

The Land is designated Green Belt

The site is located within Green Belt and an Area of Outstanding Natural Beauty (AONB). The National Planning Policy Framework says *“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*. The NPPF also says *“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”*.

This site is on the edge of the existing development and therefore a classic example of urban sprawl. It is simply trying to move the Green Belt boundary further out, expanding the urban area.

This site is also not in the Local Plan, either the existing plans or the emerging Local Plan.

The NPPF also says: *“Land included in the Green Belt must also contribute to one or more of the five purposes:*

- *To check the unrestricted sprawl of built-up areas.*
- *To safeguard the surrounding countryside from further encroachment.*
- *To prevent neighbouring towns from merging into one another.*
- *To preserve the special character of historic towns.*
- *To assist in urban regeneration.”*

This proposal clearly breaches the first two of these purposes. The surrounding countryside has an open aspect, with beautiful, unspoilt views along the Vale. This proposal is clearly encroaching on that unspoilt countryside and causing sprawl of a built-up area.

The NPPF also says: *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special*

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circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." There is a Brownfield Register for Chiltern & South Bucks that demonstrates there is a supply of previously used land that may be used for development. There are other options for meeting the five-year housing target. The NPPF is clear: this means there are no "special circumstances" that would justify building on Green Belt.

The land is also AONB

Under the Countryside and Rights of Way Act 2000 (CROW Act), you, 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. Your decisions and activities must consider the potential effect it will have within the AONB and land outside its boundary. As a local authority, you must make sure that any proposals have regard for the purpose of conserving and enhancing the natural beauty of the AONB. You should consult Natural England where development might have a significant impact, which, with up to 99 homes and 200+ people, associated cars and traffic, this application would certainly have a significant impact.

The housing is unnecessary

We have already pointed out that this site is not included in the Emerging Local Plan. So, apart from the case already made above, we would re-iterate that this site is unnecessary to meet the five year housing supply requirement. The Council has gone through an extensive consultation on possible release of Green Belt land in the combined Districts, but this site was not part of that consultation. Furthermore, because this site is not in the Local Plan, the (significant) impact on the roads, local schools, medical facilities and environmental issues such as pollution and waste etc. are not addressed (or even considered) in this proposal. The Asheridge Road, in particular, is a narrow country road that could not possibly cope with the potential addition of up to 200 cars.

Accordingly, for all the reasons we have set out, we would request that the Council refuse this application.

Yours faithfully,

Neil Salisbury
CPRE Buckinghamshire - Planning Group Chair
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