

Please return to:  
**Planning Policy Team**  
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**CHILTERN and SOUTH BUCKS**  
**COMMUNITY INFRASTRUCTURE LEVY**  
**DRAFT CHARGING SCHEDULE**  
**COMMENT FORM**

In order for the Council to introduce a CIL the Charging Schedule must be approved by an independent Examiner.

Please tick the relevant boxes:-

- I would like to be heard by the Examiner at the examination.
- I would like to be notified of submission to the examiner.
- I would like to be notified of the publication of the recommendations of the examiner and reasons for those recommendations.
- I would like to be notified of approval of the charging schedule by the District Council.

Please ensure you provided your email address on the following page  
**Completed forms must be received by 23:59 hrs on 19 July 2019.**

**Personal Details**

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**Agent Details (if applicable)**

**Name**

**Organisation**

**Address**

**Town**

**Postcode**

**Telephone No.**

**For all questions please provide any relevant evidence to support or justify your comment, or any suggested change(s), below. Please be as precise as possible. For any of the questions please continue on a separate sheet of paper if necessary.**

*The Draft Charging Schedule consultation includes the Draft Community Infrastructure Levy (CIL) Charging Rates, Charging Zone Map, a Instalments policy, and a In-kind Payment Policy which you are invited to comment on via the questions set out below:-*

**Please circle**

**If you believe that the proposed levy rates do not strike an appropriate balance between securing additional investments and potential effects on the viability of developments in the charging area, please specify.**

1. I offer this submission on behalf of **Brown Not Green Chesham Ltd** (hereafter referred to as BNG) which is a not for profit private company limited by guarantee that was incorporated in 2016 from a previous informally organised association of local people with the sole aim of protecting land around Chesham for the benefit of those living around Lye Green specifically and the wider community of Chesham generally.
2. The Company has received support from circa 1,800 local individuals and has 95 household members representing nearly 200 individuals. Membership is defined by any household who has donated funds to the Company. This submission is therefore very much focused on the needs of Chesham within the wider District of Chiltern & South Bucks.
3. BNG has concerns that the proposed CIL levy does **not** strike the appropriate balance between securing additional investments and potential effects on the viability of developments in the charging area.
4. Specifically;
  - Chesham is being earmarked for some significant development including 500+ homes on land (currently designated as Green Belt) NE of the town.
  - In addition, numerous outlying villages around Chesham are either being removed from Green Belt or being subject to infilling policies that collectively will have an impact upon the town in terms of infrastructure (specifically, highways/traffic, air quality, water & drainage as well as schools and medical facilities.).
  - Chesham is already struggling with aged infrastructure and several wards suffer from deprivation.
  - BNG are concerned there is a real risk that the proposed CIL levy will fail to deliver much needed infrastructure that will only make existing problems in the town much worse.
5. This is because the Council's CIL Funding Gap Analysis of June 2019 is acknowledging that there is already an acknowledged infrastructure spending gap of between **£179m & £231m**.

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6. BNG are concerned the infrastructure spending gap may be significantly worse than that due to many significant projects appearing to be reliant upon (unquantified) developer contributions under S.106 or S.278.
7. There is a concern that many developers will be able to resist making such contributions either on the basis of viability or that they will challenge whether the contributions sought are directly and proportionally related to the development they are undertaking.
8. Indeed, many of the site allocations in the emerging Local Plan are excluded from CIL. (ie developments over 400 homes). However, many of the contributions to be sought under say S.106, cannot be quantified because much of the costs of related infrastructure is not yet specified and is awaiting the preparation of (as yet unpublished) “masterplans” for allocated sites.
9. The fear is many sites, especially those development sites around Chesham, will either be undeliverable/unviable or worse, delivered **without** the appropriate infrastructure necessary to avoid injurious affects upon a town that is already struggling with inadequate infrastructure.
10. BNG reviewed the earlier **Infrastructure Delivery Schedule** that was added to the Council Evidence Base in late 2018. BNG’s review considered JUST the effects upon Chesham. The table is recited below with BNG comments or areas of importance highlighted in yellow. This is a most troubling picture:

Infrastructure Type	Requirement	Estimated Cost	Funding Source	Comments
<b>Health and well-being</b>				
Other environmental	Chesham - projects to address <b>air quality</b>	<b>TBC</b>	CIL/ <b>other</b>	Linked to the Air Quality Monitoring Area in Chesham and designated Air Quality Management Area. <b>Costs and actions to be determined by the Air Quality Action Plan – where is it?</b>

<p>Green Infrastructure</p>	<p>Measures to mitigate the impacts on air quality arising from additional traffic movements in the vicinity of Burnham Beeches <b>(BNG NOTE but not other GB areas? WHY? GI must be a key element in any AQMA?)</b></p>	<p>TBC</p>	<p>CIL/S106/OtherTBC</p>	<p><b>NB:</b> At this point it is not possible to identify measures to mitigate impacts as the evidence work is on-going but the potential need for measures is included in this list as an advance marker of potential future requirements</p>
<p>Health – primary</p>	<p>Expansion / modification of existing primary care services in <b>Chesham</b>, particularly for the extension of the Chess Medical Centre and the Red Lion Street surgery. <b>Appropriate financial contribution from new development needed.</b></p>	<p>£500k to relate to practice / CCG business case (appropriate financial contribution from new development needed, CCG not requesting funding for whole cost)</p>	<p>NHS England / developer contributions</p>	<p>Developer contributions to relate to practice / CCG business case</p>
<p>Flood alleviation</p>	<p><b>Chesham Flood alleviation scheme</b> – town centre proposals, potentially including <b>deculverting the River Chess along St Mary’s Way</b> and measures to improve flood water storage on the periphery of the town. CDC in discussion with EA at present in relation to options for the town centre route.</p>	<p>£7m to £20m <b>(BNG NOTE – quite a variation!)</b></p>	<p>EA/Other Contributions</p>	<p>Options for the route still under discussion with the Environment Agency</p>

Flood alleviation	<b>Pednormead End Chesham</b> – river restoration risk / natural flood management and property level protection and culvert improvement	£3.2 m	BCC, Flood Defence Grant in Aid, Local Levy (Linked to FDGiA) and private individuals and local businesses to be secured	Project partly implemented.
<b>Community Cohesion and Education</b>				
Cultural / social facilities	Community centre / facility improvements and new provision on four Green Belt options ( <b>Chesham</b> , Beaconsfield, Little Chalfont and Land north of Iver Station) e.g. creating hubs	TBC	TBC	Provision could help meet the needs of community – based services, Thames Valley Police, etc e.g, for touchdown services
Primary Education	Depending on scale of development, <b>(BNG NOTE: 900+ homes, 500 homes or just 100?)</b> a site for a new 1FE primary school and provision of land <b>within</b> Green Belt Option 1 <b>(Chesham)</b> ,	TBC	S106 / other	New school to be developed as part of a community hub with sole school access during school hours. Community access to be provided at weekends, in evenings and outside school term to enable access to key facilities e.g. school halls and playing fields. Expansion of existing schools to provide opportunities for community use of facilities. Note that sports pitch requirements are referred to in the health and

				wellbeing section of this table. The design of the school to <b>be future proofed</b> to allow for further expansion to 2FE should there be a need <b>(BNG NOTE – If whole of Chesham GB site is removed from GB is presumably for further expansion?)</b>
Secondary Education	Expansion <b>Chesham Grammar School</b>	<b>£2m (BNG NOTE: is that all? What will £2m buy?)</b>	<b>S106/CIL</b>	Expansion of existing schools to provide opportunities for community use of facilities
<b>Town centres and economic development</b>				
Town centres	Investment to enhance useage and attractiveness of the Districts’ shopping centres, e.g. public realm improvements, public art, additional parking, CCTV, etc <b>(BNG NOTE – Would Chesham really get any of this?)</b>	<b>TBC</b>	<b>TBC</b>	<b>BNG NOTE:</b> Significant retail expansion is being proposed in Chesham but <b>on the Car Park sites</b> . Car Parking is vital infrastructure to sever the customers of existing retailers. This potentially a vital area of infrastructure for the town that is being given inadequate consideration.
Economic development	Incubator space / growth space for new and fledgling businesses <b>(BNG NOTE – Where in Chesham?)</b>	<b>TBC</b>	<b>TBC</b>	<b>BNG NOTE:</b> Given the absence of sites identified, these costs could be significant.

<b>Movement and access</b>				
Transport – Road	Signalisation of Junctions on <b>A416, Chesham</b> (see local transport modelling report, July 2017) ( <b>BNG NOTE: Is that all Chesham might get?</b> )	£1.2m - £2.6m ( <b>BNG NOTE - another big variation! – However, is this even realistic? Where is the space for any significant improvements when evidence shows the junction already exceeds capacity</b> )	S106/CIL/Other -TBC	Taken from the list of mitigations in the Phase2B local transport modelling report <sup>5</sup> with indicative costs provided by Bucks CC Growth and Strategy. Costs are subject to change and further assessment and will be updated.
Transport – Sustainable	New or extended Bus services to serve new development sites	£2,450,000 to £2,520,000	CIL/S106/Bus Operators/Other-TBC	Based on cost information from Bucks CC and is as at Sept 2017. It is subject to change
Transport - sustainable	Provision of bus service infrastructure such as stops, shelters and Real Time Passenger Information, including specific requirements for <b>Green Belt options</b>	£403,000 to £418,000	CIL/S106/Bus Operators/Other-TBC	Based on cost information from Bucks CC and is as at Sept 2017. It is subject to change
Transport – Sustainable	Improvements to public transport/walking and cycling links to increase sustainable transport options between employment, services, housing and onward travel options	TBC <b>BNG NOTE – This is astonishing! The GB Option at Chesham is NOT a sustainable location and significant investment is needed to create acceptable transport links.</b>	CIL/Bus Operators/OtherTBC  <b>BNG NOTE: What happens if bus services are cut or removed in subsequent years?</b>	Could apply across the plan area, need to provide opportunities to encourage healthy communities

<p>Transport - Sustainable</p>	<p>Capacity and access improvements to railway stations including measures to enhance links to other sustainable transport</p>	<p>TBC BNG NOTE – Is this even practical?</p>	<p>CIL/TfL/Chiltern Railways/TfL/ Network Rail/MTR Crossrail/ OtherTBC</p>	<p>To include better level access opportunities to stations for people with disabilities (BNG NOTE: Though at Chesham station they will be expected to walk / cycle nearly 2.5km up/down a steep hill!)</p>
<p>Transport – Sustainable</p>	<p><b>Chesham Station</b> Interchange to improve sustainable transport options</p>	<p>TBC</p>	<p>TBC</p>	<p>Part of <b>CIC Masterplan</b></p>
<p>Transport – Sustainable</p>	<p>Charging points and infrastructure for electric vehicles</p>	<p>£440-600k</p>	<p>S106/CIL/BCC/ Other – TBC</p>	<p>To be provided in locations accessible to the public Estimated costs are provided at this point. They relate to a rapid / ultra-fast charger (£11 - 150, 000 per charging point). (BNG NOTE: Is this a typo? Potentially only 4 charging points across the whole two districts for the next 20 years!!) . These costs are likely to change as technology changes and as production of electric vehicles increases in response to the phasing out of petrol and diesel engines by 2040. Costs are based on the provision</p>



				of 10 new points in the four main centres in the plan area by 2036. This is an estimate and is subject to change. BNG Note- Is Chesham one of these 4 centres?
<b>TOTAL COSTS c/f for whole Districts as at 22.10.2018 c £177m - £222m</b> <b>BNG NOTE - Midpoint of total costs = c £199.5m</b>				

11. This exercise ONLY considers Chesham.
12. There are a significant number of projects marked “TBC” or where costs are “*subject to change*” or with a significant range of projected costs.
13. If this is replicated across the wider area of Chiltern & South Bucks (& a cursory review of the other Infrastructure Delivery Projects suggests it is) then BNG have concluded that the Infrastructure Spending Gap is very likely to be significantly higher than estimated.
14. Accordingly, a lot of important infrastructure requirements will NOT get funded.
15. BNG have concluded therefore that the proposed CIL levy does **not** strike the appropriate balance between securing additional investments and potential effects on the viability of developments in the charging area and is “**unsound**”.

Phillip Plato MRICS  
 On behalf of Brown Not Green Chesham Ltd