

CHESHAM TOWN COUNCIL'S RESPONSE TO LOCAL PLAN CONSULTATION – AUGUST 2019.

Chesham Town Council is not objecting to the Local Plan as a whole, but we are concerned that we were not involved in discussions on the development of the plan prior to the public consultation period. As a result, we have severe reservations about particular parts of the Local Plan. Our key areas of concern are:

- The decision to identify a large Green Belt site for development, rather than higher density housing in the town centre in line with the Chesham Masterplan.
- Key Economic Sites continue to be located in the town centre, as opposed to the Masterplan's vision of sites on the periphery of the town.
- Inadequate car parking provision in the town centre, which will damage the sustainability of the High Street, made worse by the proposed removal of existing car parks.
- Retail allocation for Star Yard car park, which we are not confident will come forward.
- A weak policy for sustainable drainage which will fail to protect Chesham from flooding and pollution.
- The fact that the Sustainability Appraisal identifies that the Local Plan will reduce local water quality and increase pressure on water resources.
- Inadequate planning for the increased demand for wastewater services.
- The fact that the IDIDS¹ that is out of date and doesn't articulate urgent infrastructure provision that is needed now and in the future.
- The impact of the proposed areas of development on the town's air quality, particularly in the Air Quality Management Area.

We detail our concerns below:

Green Belt Site to the North East of Chesham – SP-BP2 and SP-BP3

The Town Council does not believe that the identification of the site to the North East of Chesham is justified. It does not accord with the Government's own National Guidance on Green Belt development, namely that it needs to be sustainable; should not have an unacceptable effect on the Green Belt and should only be considered in 'exceptional circumstances':

The Town council would strongly challenge the suitability of the site in terms of sustainability and viability for the following reasons:

- The increased housing and resident numbers would lead to a projected 400% increase in traffic delays at the White Hill roundabout already deemed at full capacity. These figures do not yet include the inevitable additional traffic increases caused by the services and sub-contractors supporting the construction of HS2, which will further exacerbate our traffic congestion. This is particularly pertinent due to the proximity of the depot servicing the end of the tunnel near the site of the former Annie Bailey's restaurant in Hyde End. Moreover, Berkhamstead Road and Broad Street are already designated an Air Quality Management Area and it is incumbent on all authorities under national law, including the District Council, to actively promote measures that will decrease pollution levels rather than increase them.
- The increase in housing would lead to a projected 200% increase in traffic delays at the Blucher Street roundabout already deemed at full capacity. Again, as a lead authority campaigning

¹ Interim Draft Infrastructure Delivery Schedule

against HS2, it is vital that the District Council factor in the inevitable increases in traffic needed to service HS2.

- The lengthy queues and delays caused by the above (exacerbated by limited public transport and additional traffic trying to access the Metropolitan Line station in the town centre for trains to London) would discourage people from visiting the town centre. This in turn would have a direct impact on the economic well-being of many small businesses and undermine a lot of good historic and ongoing work designed to revitalise the High Street. Work recognised by the District when they recently selected Chesham high street as the preferred settlement to be the subject of a Future High Street Fund application.
- Policy DM DP9 deals specifically with Reducing Reliance on the Private Car and calls for the accommodation of walking and cycling as a primary means of transport. Whilst this is deliverable on a larger strategic site like this we feel it is impossible to achieve in a high density urban setting in Chesham. Policy DM CP2 also calls for the implementation of 'direct, safe and secure pedestrian routes and cycleways', which could be provided on this site. However, no provision can be being made to connect these routes to and through the adjacent, already developed, urban settlement.
- The development would lead to the real possibility of flooding; Brushwood Road and The Spinney which sit adjacent to this site already have a history of flooding issues. The Chesham Flood Action Group is a key partner of the Bucks Strategic Flood Team and the Environment Agency, both of which are currently investigating flood risks attached to over 100 local properties.
- The capacity of Chesham Sewage Treatments Works can already be exceeded during periods of intense rainfall or high groundwater levels, and the additional housing stock would exacerbate this problem. It was confirmed by Thames Water at a public meeting in 2018 that they would need to potentially build an additional 20 waste storage tanks costing circa £20m in order to protect our chalk stream and natural environment, but we not aware of any plans to increase capacity.
- Local abstraction for the public water supply often exceeds licensed limits, with water having to be pumped into the area to meet demand. Strategic low-flow investigations have identified that the current level of abstraction from the local aquifer is having a detrimental impact on the River Chess. The Chess, an internationally rare chalk stream, now runs dry for extended periods of time over a significant portion of its Chesham stretch.
- The type of housing that Chesham needs includes small starter units, affordable housing and smaller homes for the elderly where people are typically less mobile. None of these are suitable or appropriate on a site such as this on the edge of town and isolated from crucial support facilities. The Town Council has a clear preference for higher density housing closer to the town centre, which we believe can be delivered through a credible alternative development plan which includes a number of different sites, for example, the site at Higham Mead.
- The lack of a complimentary employment or mixed use development in Chesham will result in the likelihood of more residents working out of town, thus adding to the pressures on existing transportation provision and being of no material economic benefit to Chesham.
- Releasing this land from the Green Belt would encroach on the countryside, leading to urban sprawl. The location of this site would also result in the unacceptable absorption of the historic hamlet of Lye Green into Chesham. Lye Green includes three listed buildings, a historic farm and a pub of historic interest, which is also a community facility. Such absorption is in direct contravention of Green Belt policy.

- The development would undoubtedly have an effect on local wildlife, specifically the nesting bird population, some of which are on the endangered species list. Those on the RSPB 'Red' List spotted at the site include: Cuckoo, Fieldfare, Grey Wagtail, House Sparrow, Mistle Thrush, Redwing, Song Thrush, Starling and Yellow Hammer. Moreover, other protected species such as the Red Kite and bats are to be found there and there is also long-established woodland, supporting a range of wildlife on the site.
- This development would dramatically and negatively affect the setting of the AONB which is immediately adjacent to the proposed site. The detrimental impact on the setting of the AONB is acknowledged within the District's evidence base.

In general terms, it is self-evident that such a development would also need massive infrastructure investment in services, including increased parking provision in the town centre; road improvements on all access routes where currently restricted; enhanced public transport; improved drainage and increased capacity of the sewage treatment works and new and enhanced health service provision. Moreover, in this Council's view, the proposal is inconsistent with national planning guidance as there are no "exceptional circumstances" to warrant its removal from Green Belt designation.

Rather than siting development on the Green Belt, we propose as a deliverable alternative, increased housing density in the town centre, in line with the Chesham Masterplan produced by the Chesham Renaissance Community Interest Company (CRCIC). CRCIC's Masterplan consultation (November 2017 to January 2018) demonstrated that protection of the Green Belt was of key importance to the local community with 73% of consultees being opposed to development on Green Belt and in support of new dwellings in the centre of town. The town council is a founding member of CRCIC and strongly supports the principle of higher density housing in the town centre, as opposed to Green Belt Development.

Car Parking and Retail in the town centre: SP-EP2 & SP-EP3

The Town Council does not believe that the proposals for car parking and retail space are appropriate. In 2017, the SWOT analysis of Chesham town centre in Chiltern District Council's Retail and Leisure Study stated that Chesham is oversupplied with retail space. Retail floorspace projections in the Local Plan come from the Town Centre Retail and Leisure Study (TCRLS), which is based on outdated 2016 data. The 2019 Peer Review and Update of the TCRLS states that there is a limited need to allocate sites for comparison goods retail and food/beverage floorspace. It also says that January 2019 observations suggest the vacancy rate in Chesham town centre units has increased since the study was done. As vacant units can help to accommodate future growth, we believe that the amount of new floorspace should be revised downwards accordingly.

In line with our support for higher density housing in Chesham town centre, the Town Council questions the soundness of the proposals for key land use in the town centre as specified within the Local Plan. We believe that the proposed enterprise/retail allocations for Chesham will severely limit possible housing development and will impact on the town centre's independent retail sector, with no guarantee that large scale retailers will come forward.

The 2017 SWOT analysis stated that there was inadequate parking for the centre and the railway station. The Town Council was in agreement with this analysis at the time and the problem will have become more severe over the last two years, particularly as Chesham Station is one of the top three fastest growing tube stations in terms of entry and exit figures. Back in 2017, the Town Council responded to the SWOT analysis that "Chesham is beginning to reach capacity at certain times and periods in its car parks and this needs consideration with the expected population". Whilst Policy SP

EP3 refers to re-provisioning the car parks at Star Yard and the Station, there appears to be no plan to replace, let alone increase capacity, which would be even more essential should this additional retail space become occupied. We are very concerned at the loss of any town centre car parking and the impact that this will have on the viability of the High Street.

We are also disappointed to see that an area of retail allocation has been identified on the Enterprising Places policy map. The site runs along The Backs and is currently car parking space for a large national food retailer and Chesham Underground station. It is vital that this site continues to provide essential car parking provision. There is a need to increase parking capacity, particularly for the station.

Sustainability DM-NP6 & 8

The Chilterns area is recognised as having the highest level of water consumption per resident, greatly in excess of any other Affinity supply area. It is disappointing that the Sustainability Appraisal notes that development proposed in the Local Plan will be likely to increase total water consumption in some locations and that the plan does not set guidelines for the recycling of water on site.

The Town Council believes that Policy DMN8 on Sustainable Drainage Solutions (SuDS) does not do enough to protect Chesham from flooding and water pollution. The Policy only requires management and maintenance plans for large scale SuDS. In Chesham, it is likely that many developments will be small scale infill development, with similarly small-scale SuDS. If these aren't maintained and managed, it will lead to a build-up of unmanaged (and very quickly non-functioning) SuDS across the town. As the town is in a steeply-sided valley, the majority of this will end up as polluted run-off at the valley bottom (the town centre) contributing to flooding of the town, increased pressure on the already inadequate Vale Brook culvert, and further pollution of the River Chess. Under Blue and Green Infrastructure, the Local Plan is committed to legal agreements for public space maintenance. The town council believes that similar agreements should be stipulated for management of SuDS. We understand that the Lead Local Flood Authority, as a statutory consultee, ensures that developments do not exceed surface water runoff rates and volumes from the Mean Annual Flood Flow (equivalent to the 1 in 2 year event) up to the 1 in 100 year event, plus an allowance for climate change. We would like the Local Plan to be stronger in its wording, making it clear that applicants for all sizes of development are required to take account of the advice provided by the Lead Local Flood Authority.

The Sustainability Appraisal of the Local Plan appears to identify that the plan is unsound with respect to Policy DM NP6. This Policy states that development will only be permitted if it does not adversely affect the character, flow potential and water quality of rivers. The Sustainable Appraisal says that "The Local Plan would likely lead to a reduction in local water quality" and that "The large quantity of development proposed in the Local Plan would be likely to increase pressures on water resources". This indicates that insufficient protection measures have been put in place within the plan to facilitate development without damage to our water environment.

Infrastructure Delivery

The Town Council is very concerned as to how Chesham Sewage Treatment Works (CSTW) will cope with the increased population in the area that it serves, which reaches beyond Chesham. The Draft Infrastructure Delivery Plan (DIDP) published in June 2019 seems to rely on the Chesham Drainage Strategy Stage One. Stage One only refers up to 2017. This document states that the (then proposed) 2018 upgrade to the CSTW will cater for the projected population growth in the catchment to a 2026 design horizon, indicating that insufficient plans are included within the Local

Plan to provide capacity for the whole duration of the Local Plan. The DIDP says that CSTW may need improvements to cope with the strategic allocation for Chesham, but is not definitive about this. It should also be borne in mind that CSTW does not just deal with wastewater from Chesham, but from a broader catchment including the villages of Bellingdon, Botley, Buckland Common, Chartridge, Chesham Bois, Cholesbury, Bovingdon and Flaunden. What plans are in place to cope with increased housing at these sites? We are also concerned that there is no reference to wastewater in policy BP SP2 dealing with the site at the north-east of Chesham, whereas flooding, air quality, roads and health provision have been included.

The Town Council notes the potential funding gap estimated to be between £179-£231m for infrastructure delivery and questions how this gap will be bridged.

Part of the evidence base, the Interim Draft Infrastructure Delivery Schedule (IDIDS) of November 2017 is out of date and fundamentally flawed. As a 'living document' it should be continually reviewed and updated and we feel the following amendments need to be made:

- Secondary Education: Expansion of Chiltern Hills Academy: a recent planning application was submitted to Bucks County Council's planning team detailing an ambitious expansion and improvement project. The cost and timescale details are therefore available for inclusion in the IDIDS.
- Considering the AQMA that exists in Chesham and the increasing congestion throughout the day, and no longer just at peak travel times, it is disappointing that there are no plans to make capacity improvements along the main arterial route through Chesham, although the IDIDS references the signalisation of junctions on the A416. Some minor works have been delivered by Bucks County Council but we feel they fall within the scope of regular maintenance works rather than infrastructure improvements. Particularly in light of the Sustainability Appraisal stating that development will lead to a decrease in local air quality, we would urge that further transport modelling and subsequent works need to be brought forward.
- It is disappointing that neither Affinity nor Thames Water are in a position to populate the IDIDS with projects and costings in spite of recent consultation and planning processes being delivered.
- The IDIDS is factually incorrect when it details Flood Alleviation schemes in Chesham. The River Chess does not run along St Mary's Way. The Vale Brook Culvert runs underneath Chesham high street in a damaged, unfit for purpose Victorian tunnel that is in imminent danger of collapse. It then surfaces and joins the River Chess in Duck Alley at the rear of Red Lion Street. The District are in disagreement with the Environment Agency with regard to the location of a new, open channel, which costs considerably in excess of £3M.
- The Pednormead End project has been costed by Bucks County Council's strategic flood team and this project needs to be updated with cost and timescale details.
- The Open Space and Outdoor Sports Facilities section needs to include the current plans to deliver new community sport pitches at Chiltern Hills Academy on Chartridge Lane. Full costings and timescales are available.
- The IDIDS does not include any detail of measures to mitigate the impacts arising from additional traffic movements in the vicinity of Chesham, Amersham and the surrounding villages affected by the construction of HS2.

Economic Sites DM-EP3

The Key Economic Sites for Chesham are all town centre based, which will exacerbate problems with traffic and air quality; all three are located just off the Air Quality Management Area. Both the Alma Road and Higham Mead sites are particularly unsuited for employment use as they are surrounded by high density housing, with poor access. The Higham Mead site is much more preferable for housing development, and due to its flat location, it would be appropriate to help address the shortage of housing for older persons.

A large brownfield section of the site that has been identified as a Strategic Employment Site on Asheridge site has already been granted planning consent by Chiltern District Council to be converted to housing.

The town council is supportive of the CRIC's position in the Masterplan that employment sites should be located at the edge of town and the Council understands that deliverable sites have been identified.

Social Housing DM LP2 & 3

The Town Council is supportive of social housing as well as affordable housing, but would like to take the opportunity to emphasise that within a district-wide plan, such housing should be spread across Chiltern and South Bucks and not simply located in urban areas like Chesham.

Community Infrastructure Levy

The Town Council is supportive of the introduction of the Community Infrastructure Levy. However, we are not confident that the DIDP has accurately identified what infrastructure is needed and how much it will cost as there are a lot of gaps in DIDP Appendix One.

We are keen to encourage smaller/local shop developments and would like the council to consider introducing a lower charging rate for such developments.