

Chiltern District Council and South Bucks District Council

Consultation Statement for Regulation 19 Publication stage Chiltern and South Bucks District Councils Local Plan 2036

Revised 14 June 2019



CHILTERN
District Council



SOUTH BUCKS
District Council

Stronger in partnership

1. Background

- 1.1 During most of 2015 Chiltern District Council and South Bucks District Council were separately preparing replacement local plans for their respective adopted core strategies and saved local plans and planned to roll their plan period forward to 2036. As part of that exercise both Councils also included a 'Regulation 18' Consultation aimed at seeking initial views on the scope of the plans and identifying issues to be resolved together with a 'Call for Sites' to provide the opportunity for potential development sites to be nominated for consideration as part of the local plan preparation processes.
- 1.2 However, following the decision by both Councils to produce a single, joint Local Plan the Councils carried out two consultations – the Initial (Regulation 18) Consultation incorporating Issues and Options in early 2016, and the Preferred Green Belt Options Consultation later in the year. The representations submitted on the earlier Chiltern District Local Plan Regulation 18 Consultation (which ran from January 2015 to March 2015) and/or the South Bucks District Local Plan Regulation 18 Consultation (which was carried out from February 2015 to April 2015) were not considered as part of the joint local plan moving forward.

2 Regulation 18 Initial Consultation incorporating Issues and Options

- 2.1 Consultation on the Regulation 18 Including Issues and Options Consultation was carried out for an eight week period from the 19th of January 2016 until 5pm on the 14th of March 2016.
- 2.2 The consultation invited views on proposed issues and options covering Chiltern and South Bucks Districts. The collected views were taken forward to the following Local Plan production stages, namely the next stage of the 'Preferred Green Belt Options' Consultation.
- 2.3 The consultation document asked 17 questions regarding different topics such as the housing and employment development needs, Green Belt, affordable housing and infrastructure needs. The consultation also proposed 12 Spatial Strategy Options which considered different methods for meeting future housing and employment need and invited comment on these and the opportunity to propose others.
- 2.4 Other Issues included in the Consultation are:
- Vision and Plan Objectives
 - Heritage
 - Local Green Space Designations
 - Local Measures
 - Scope for Development Management Policies

- Infrastructure Delivery / CIL?
- Planning for unmet needs
- Pressure from Berkshire/London
- Our unmet needs estimated at 7,500 dwellings and equivalent employment allocation.

2.5 Consultation Document, Details, Response Forms and Evidence Base were made available on-line: <https://www.chiltern.gov.uk/planning/localplanevidence> and <https://www.southbucks.gov.uk/planning/localplanevidence> (note that these pages have now been renamed ...planning/local plan).

3 Consultation on Preferred Green Belt Options

3.1 Consultation on Preferred Green Belt Options was carried out for a six week period from the 31st October 2016 until 5pm on the 12th of December 2016. It followed on from the Initial (Regulation 18) Consultation Incorporating Issues and Options carried out in early 2016 where Green Belt concerns were raised as a major issue of concern with local residents and other key stakeholders.

3.2 The consultation contained 15 options (areas) being considered for release from the Green Belt as part of the emerging Local Plan in order to help meet the development needs for the Districts. The Consultation documents, forms, exhibition material and other information were placed on the councils' websites: <https://www.chiltern.gov.uk/planning/localplanevidence> and <https://www.southbucks.gov.uk/planning/localplanevidence> (note that these pages have now been renamed ...planning/localplan).

3.3 Under Regulations 18 and 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Councils have produced this Consultation Report which sets out:

- Which bodies and persons were invited to make representations under regulation 18;
- How those bodies and persons were invited to make such representations;
- A summary of the main issues raised by those representations, and
- How those main issues have been addressed in the Local Plan.

4 Which bodies and persons were invited to make representations under regulation 18?

- 4.1 In terms of which bodies and persons were invited to make representations under regulation 18, the Regulations include the requirement to consult the public including 'specific and general consultation bodies', as well as consulting those residents and/or businesses the local authority considers appropriate.
- 4.2 The 'specific consultation bodies' are listed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Duty to co-operate bodies must be consulted as well, and they are listed in Part 2 of the Regulations. The 'specific consultation bodies and Duty to co-operate bodies include
- (a) the Coal Authority;
 - (b) the Environment Agency;
 - (c) the Historic Buildings and Monuments Commission for England (known as English Heritage);
 - (d) the Marine Management Organisation;
 - (e) Natural England;
 - (f) Network Rail Infrastructure Limited (company number 2904587);
 - (g) the Highways Agency;
 - (h) a relevant authority any part of whose area is in or adjoins the local planning authority's area;
 - (i) any person – (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003, and (ii) who owns or controls electronic communications apparatus situated in any part of the local planning authority's area;
 - (j) if it exercises functions in any part of the local planning authority's area – (i) a Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section; (ii) a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989; (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986; (iv) a sewerage undertaker; and (v) a water undertaker;
 - (k) the Homes and Communities Agency.
- 4.3 A list of the 'specific consultation bodies' applicable to Chiltern and South Bucks District Councils and who were invited to make representations on the Regulation 18 Initial Issues and Options Consultation document and the Preferred Green Belt Options Consultation document is contained in **Appendix 1**. Broadly, this list

incorporates statutory consultees, key strategic partners, service and infrastructure providers as well as environmental bodies.

- 4.4 The 'general consultation bodies' are also listed in Regulation 2 and include
- (i) voluntary bodies some or all whose activities benefit any part of the local authority's area;
 - (ii) bodies which represent the interests of different racial, ethnic or national groups in the local authority's area;
 - (iii) bodies which represent the interests of different religious groups in the local authority's area;
 - (iv) bodies which represent the interests of disabled persons in the local authority's area; and
 - (v) bodies which represent the interests of persons carrying on business in the local authority's area. The exact organisations that fall into this group vary locally.
- 4.5 A list of the 'general consultation bodies' for Chiltern and South Bucks bodies and who were invited to make representations on the Regulation 18 Initial Issues and Options Consultation document and the Preferred Green Belt Options Consultation document is contained in **Appendix 2**.

5 How those bodies and persons were invited to make such representations

- 5.1 The consultations were undertaken in accordance with both councils' Statement of Community Involvement (SCI), and in line with Regulations 18 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The following paragraphs detail the steps the councils took to engage those bodies and persons who were invited to make representations.
- 5.2 The consultations were advertised by a number of methods to notify and invite bodies and persons to make representations.
- 5.3 Prior to commencement of the consultation on the Regulation 18 Initial Issues and Options consultation document 2,765 letters or emails were sent to individuals, local groups and organisations who had registered for their details to be held on the respective Councils' consultation databases.
- 5.4 Similarly, for consultation on the Preferred Green Belt Options Consultation document, 3,234 notifications were also sent to individuals, local groups and organisations who had registered for their details to be held on the respective Councils' consultation databases. 2,788 were sent by email and 446 sent by post.

- 5.5 The letters and emails sent to consultees contained detailed information on what the consultees were being consulted on by the councils, when the consultations opened and closed, with links provided to the appropriate consultation documents. Information on places where hard copies of the consultation documents could be viewed together with how they could get further information about the consultation and make and submit their representations in time was explicitly stated.
- 5.6 Several Press releases were made in advance of the public consultations. For example, for the Regulation 18 Initial Issues and Options consultation Press releases were made on 11th January and 18th January 2016. For the Preferred Green Belt Options consultation there was a Press release on 13th October 2016.
- 5.7 There was Media coverage in all local newspapers and on local radio.
- 5.8 Advanced notifications were advertised on both Councils' websites along with updates during the consultations. The consultation processes were also advertised on both Councils' website Home Pages 'Hero Banners' (rotating headlines) during the consultation periods.
- 5.9 Regular 'Tweets' were sent out via the Councils' Twitter accounts and 'postings' on the Councils' Facebook accounts during the consultation periods and re-tweets on community based accounts such as Streetlife. Joint Local Plan messages were circulated widely through other people's, organisations' and action groups Twitter, Facebook and Streetlife accounts. On average each had about 500 followers which was reckoned to equate to over 6,000 people overall;
- 5.10 Advertisements were placed on the Traveller Times website;
- 5.11 Notifications were made to local businesses through Bucks Business First website;
- 5.12 In all circumstances, hard copies of the consultation documents, and response forms were made available in all libraries serving both Districts and in Council offices in Amersham and Denham. Copies to download were placed on the Councils' websites at the beginning of and throughout the consultation periods.
- 5.13 An online response form was made available on the website.
- 5.14 Invitations were sent out to all town and parish councils and key local groups to host public meetings during the consultation periods. For the Regulation 18 Initial Issues and Options consultation a total of 16 meetings were held in various locations [Chalfont St Peter, Amersham (2 events), Great Missenden, Little Chalfont, Chesham (2 events), Cholesbury, Chalfont St Giles, Ashley Green, Beaconsfield, Farnham Royal, Iver, Gerrards Cross, Stoke Poges and Wexham] with an estimated collective audience of over 1,000 people. An 18 minute presentation video was shown to attendees with opportunity given for questions and answers from leading district councillors and

ward members. For the Preferred Green Belt Options consultation a video showing all 15 options together with drone footage was produced and shown in order to provide a context to the options. This was also published on the web via YouTube.

- 5.15 13 public exhibitions were held at various venues early on in the consultation periods with estimates of over 1,500 people attending them. Further, 2 permanent exhibitions were on display at both Council Offices throughout the Consultation periods (when display boards were not in use at one of the 13 exhibitions).
- 5.16 Prior to the consultations, briefings were provided to all elected representatives (MPs and Buckinghamshire County, District and Town and Parish councillors covering Chiltern and South Bucks districts), and elected representatives and Town and Parish Councils were asked to use their networks, meetings and communications to publicise the consultations and raise awareness.
- 5.17 Equally too, a number of meetings for all County, District, Town and Parish Councillors and MPs with presentations on the Joint Local Plan consultation and the Preferred Green Belt Options consultation were convened.
- 5.18 Again, at least two invited public stakeholder meetings were held at CDC and SBDC on 19th and 20th January 2016 for all parishes, local organisations and interest groups on the Joint Local Plan. Similarly, two invited public stakeholder meetings were also held on 26th October 2016 at Kings Church, Amersham and 31st October 2016 at South Bucks District Council on the Preferred Green Belt Options consultation. In advance of these meetings representatives of local groups were provided with information on the consultation start dates and potential dates and venues for the public exhibitions, and were invited to ask questions/clarifications and asked to use their memberships, networks, meetings and communications to publicise the consultation and raise awareness.

6 Summary of the main issues raised by those representations

- 6.1 A detailed spreadsheet of all comments received from consultees on both the Regulation 18 Initial Issues and Options consultation and the Preferred Green Belt Options consultation and the councils' responses to the comments can be found online at: <https://www.chiltern.gov.uk/planning/localplanevidence> and <https://www.southbucks.gov.uk/planning/localplanevidence>
- 6.2 A summary of the major issues raised in the Regulation 18 Initial Issues and Options Consultation document by those representations is presented here.
- 6.3 For the Regulation 18 Initial Issues and Options Consultation document, the councils received 5,431 responses from a wide range of consultees, including developers and Registered Social Landlords (RSLs), other councils, statutory and other key consultees

e.g. English Heritage, Environment Agency, Natural England, and amenity/community groups, and individuals (See attached appendices for details of the bodies consulted). 157 representations were received outside of the consultation period and were not considered by the councils. Comments made were very constructive and have helped shape and inform the preparation of the Joint Local Plan.

- 6.4 A summary of the main issues raised during this Consultation and the number and percentage of respondents who raised them is shown in Figure 1 below. The 6 issues raised the most are the Green Belt, Infrastructure, Housing, Traffic, Education and the Area of Outstanding Natural Beauty.

Figure 1: Summary of Main Subject Issues

Subject	No. of Responses	% of Responses
Green Belt	4,600	84.70
Infrastructure	3,147	57.95
Housing	2,855	52.57
Traffic	2,630	48.43
Education	2,529	46.57
AONB	2,417	44.50
Open Space/Outdoor Recreation	2,080	38.30
Health (Hospitals and GPs)	2,030	37.38
Parking	1,494	27.51
Transport (Inc. Public Transport)	1,447	26.64
Flooding	1,433	26.39
Character/Design	1,331	24.51
Biodiversity	1,088	20.03
HS2	1,074	19.78
Woodland	916	16.87
Affordable Housing	637	11.73
Heritage	608	11.19
Community Facilities	577	10.62
Local Green Spaces/Public Open Space	523	9.63
Pollution	452	8.32
HELAA (Evidence Base Document)	424	7.81
HEDNA (Evidence Base Document)	404	7.44
Specialist Accommodation	376	6.92
Ancient Woodland	268	4.93
Part 1 Green Belt Assessment (Evidence Base Document)	229	4.22
Duty to Co-operate	228	4.20
Community Infrastructure Levy (CIL)	113	2.08
Comments about the Consultation Process	81	1.49
Infrastructure Capacity Study (Evidence Base Document)	37	0.68

Sustainability Appraisal (Evidence Base Document)	25	0.46
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- 6.5 The Green Belt was mentioned in 84.7% of responses; the highest across all issues. The main settlements where the issue of Green Belt was discussed the highest was in Little Chalfont (1,410 responses), Chalfont St Giles (483 responses) and Chalfont St Peter (378 responses). The Green Belt was also mentioned 903 times but to no specified settlement.
- 6.6 Infrastructure was mentioned in 57.95% of responses and the issue had the largest use in the responses regarding Little Chalfont (1,157 responses). The issue was also used 573 times without specifying a town.
- 6.7 Housing was raised in 52.57% of the responses. The issue was used most in terms of not specifying a location (596 responses) closely followed by Little Chalfont (518 responses). There was also a high use of the issue in responses in regards to Chalfont St Giles (380 responses) and Chalfont St Peter (352 responses).
- 6.8 Traffic was discussed in 48.43% of the responses. The highest use of the issue in responses was in regards to Little Chalfont (947 responses) followed by Chalfont St Giles (448 responses) and Chalfont St Peter (205 responses).
- 6.9 Education was mentioned in 46.57% of the responses. Little Chalfont had the highest number of comments regarding education (975 responses). The issue was also discussed in regards to Chalfont St Giles (513 responses) and Chalfont St Peter (357 responses).
- 6.10 The AONB (development as a threat to the AONB) was raised in 44.50% of the responses. Responses discussing Little Chalfont had the highest use of the issue (1,109 responses), followed by Chalfont St Giles (574 responses). 407 responses mentioned the AONB but did not specify a settlement.
- 6.11 Other issues were also raised within the responses to significant levels, namely Open Space/Outdoor Recreation (used in 38.30% of responses), Health including hospitals and GPs (mentioned in 37.38% of the responses) and Parking (used in 27.51% of responses).
- 6.12 With regard to responses on proposed 12 potential Spatial Options, the three most supported were Option A (Making more Efficient and Effective use of land) (7.42% of total responses), followed by Option J (Additional Sustainable Growth Options in built up areas and/or in the Green Belt close to train stations) (5.71% of total responses), and Option C (Built Area Extension(s) to Principal Settlements) (3.57% of total responses).

- 6.13 Table 1 below highlights the most supported Options within the responses made. A full list of the options proposed is contained in the Chiltern and South Bucks Local Plan Regulation 18 Initial Issues and Options consultation, January/March 2016.

Table 1: The Most Supported Options within Responses

The Most Supported Options within Responses	No of Responses
A	403
J	310
C	194

- 6.14 Also, the three most objected to Spatial Options were Option C (Built Area Extension(s) to Principal Settlements) (48.32% of total responses), Option E (Built Area Extensions to a wider range of settlements) (20.97% of total responses) and Option K(v) (Explore new Strategic Employment Options in the Green Belt) with (17.98% of total responses). Table 2 below shows the number of objections to these Options.

Table 2: The Most Objected to Options within Responses

Most Objected to Spatial Option	No. of Responses
C	2, 624
E	1, 139
K(v)	1, 021

7. For the Preferred Green Belt Options Consultation, 3,027 responses were duly made as part of the consultation with 67 responses being made outside of the consultation period (late representations). 2,810 responses were made by individuals and 217 made by organisations.
- 7.1 A summary of the main issues raised in the Preferred Green Belt Options Consultation document in relation to the suitability for development on the options identified, and the type of development that should be sought should they come forward is presented here.
- 7.2 The principle that land should not be released from Green Belt for development was a major issue raised. 73 objections on this principle were raised on all options.
- 7.3 With reference to **Option 1 – Land North East of Chesham**, traffic was listed as an issue, mainly that the development would have an adverse impact on the levels of traffic in the immediate vicinity and the wider Town. Infrastructure provision (i.e. education, health provision and transport) was also raised many times. Consultees raised the issue that improvements to the existing infrastructure provision would be needed should Option 1 be brought forward.

- 7.4 The main issues raised in objection to **Option 2 – Area South of Holmer Green** - were infrastructure provision such as traffic, health and education. Over 40% of the respondents were against the principle of development in the Green Belt. The impact on biodiversity and visual impacts on the AONB was of particular concern to Duty to Co-operate and Other Key Consultees.
- 7.5 Impact on AONB and traffic considerations were the main issues raised on **Option 3 – Land East of Hazlemere**. Infrastructure issues such as education and health provision were additional concerns.
- 7.6 The principle of development in the Green Belt was a main issue for **Option 4 – Area South of London Road West, Amersham Old Town**. Objections were based on townscape and landscape issues, and AONB considerations and traffic impact. For the Duty to Co-operate and Other Key Consultees the main issues were related to highways (access), biodiversity, water quality and landscape (AONB).
- 7.7 For **Option 5 – Area South East of Whielden Street, Amersham Old Town** the main issues were identical to the issues raised for Option 4. Townscape and landscape issues together with traffic were the main issues raised. Highways (access) and potential impact on the historic character of Amersham Old Town were of major concern to the Duty to Co-operate and Other Key Consultees.
- 7.8 Regarding **Option 6 – Area South East of Little Chalfont** the main issues raised related to the impacts on infrastructure provision; traffic, health provision, education, parking and transport. Issues of biodiversity, townscape (character and overdevelopment) and landscape (AONB) were also raised. Option 6 had the most objections (964 objections) out of any of the Options identified as part of the Preferred Options Consultation.
- 7.9 The main issues raised in objection to **Option 7 – National Epilepsy Centre, Chalfont St Peter** - related to the impacts on infrastructure provision (including health provision, transport, and education) as well as the impact on the Green Belt.
- 7.10 The most prominent issue raised in objection to **Option 8 – Area South East of Chalfont St Peter** - concerned the impacts on open space provision, namely the loss of land used by the Paccar Scout Camp. Issues concerning infrastructure provision (education, traffic, transport, and health provision) together with the effects this would have on the character of the area, mainly the adjacent Established Residential Area of Special Character (ERASC) were raised. The issue of impact on flooding was raised by the Environment Agency.
- 7.11 In relation to **Option 9 – Area East of Beaconsfield** the most prominent issues raised concerned the impacts on infrastructure provision (education, traffic and

health provision) together with the effects this would have on the character of the area and Green Belt.

- 7.12 In the case of **Option 10 – Land North of Denham Roundabout** the main issue is the impact the release of the Green Belt would have on traffic, as the option is situated off a motorway junction.
- 7.13 For **Option 11 – Land North of Iver Heath, South East of Pinewood** the loss of open space with its impact on the Green Belt was a main issue.
- 7.14 In relation to **Option 12 – Area West of Iver Heath** its potential impact on traffic, with the site being situated north of the Five-Points Roundabout, was a main issue.
- 7.15 The potential impact of **Option 13 – Area North of Iver Station** on traffic, given the site’s close proximity to the other industrial estates within Iver Village, was a main issue.
- 7.16 The potential impact on traffic of **Option 14 – Area to the East of Ridgeway Business Park, Iver** was the main issue.
- 7.17 Regarding **Option 15 – Land Adjacent to Taplow Station** no notable issue was raised.
- 7.18 In addition to issues raised in relation to various Options, issues were raised on the Evidence Base Studies underpinning the Local Plan. Table 3 highlights these issues.

Table 3: Main Issues Raised on Evidence Base Studies

Evidence Base Study	Main Issues Raised
Housing and Economic Land Availability Assessment (HELAA)	<ul style="list-style-type: none"> • Site-specific issues • Developers challenging their sites not being progressed • Challenges from residents that all possible brownfield sites had not been fully considered before the Councils considered the Green Belt.
Green Belt Assessment Parts One and Two	<ul style="list-style-type: none"> • Site-specific issues i.e. developers challenging why their sites had not been taken forward and residents challenging why sites in their area had been taken forward; • Challenges on the approach to determine where ‘exceptional circumstances’ may apply; • Inconsistencies in the assessment of certain sites/areas;

	<ul style="list-style-type: none"> • Challenges to the methodology used; and • Errors on specific proformas.
Infrastructure Capacity Study	<ul style="list-style-type: none"> • Incomplete; • Out of date; and • Not considered the entire existing infrastructure.
Sustainability Appraisal	<ul style="list-style-type: none"> • Not included Preferred Options Consultation sites/options – based on the Regulation 18 Options; • Incomplete; • Not reflecting the objectives of the plan; and • Not meeting EU Requirements for SEA.
Inner Green Belt Boundary Review	<ul style="list-style-type: none"> • Not yet carried out – should have been completed prior to Preferred Options Consultation.
Green Belt Development Options Appraisal Document	<ul style="list-style-type: none"> • Site-specific issues i.e. developers challenging why their sites had not been taken forward and residents challenging why sites in their area had been taken forward; • Inaccuracies and discrepancies; and • Challenges against the methodology
Housing and Economic Development Needs Assessment (HEDNA)	<ul style="list-style-type: none"> • Unjustified housing need; • Does not consider the impacts of Heathrow and other major infrastructure projects; • Should resist the Government's objective to boost housing supply; • No account of impacts from Brexit; and • Incorrect methodology for assessing needs
Transport Modelling (Level 1)	<ul style="list-style-type: none"> • Published after the start of the Consultation; • Contradictions in the findings; and • Some of the Preferred Options sites not included within the document.
Definition of Housing Market Area/Functional Economic Market Areas in Buckinghamshire	<ul style="list-style-type: none"> • Lack of co-ordination regarding relationship with Hertfordshire and Berkshire; and • South Bucks have a closer

	relationship with the Berkshire authorities.
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8 How those main issues have been addressed in the Local Plan

- 8.1 All duly made responses received within the consultation period were considered at relevant stages of the plan making process. The Regulation 18 Initial Issues and Options consultation and the Preferred Green Belt Options consultation provided the councils with the contributions from their communities and other stakeholders in the preparation of the Local Plan as well as gave the communities and stakeholders the opportunity to help shape the development of their Local Plan. Consequently, the policies and proposals of the Joint Local Plan have been drafted taking into account these consultees' comments, and the findings of the evidence base studies to back them.
- 8.2 With regard to Regulation 18 Initial Issues and Options Consultation and how the main issues raised have been addressed in the preparation of the Local Plan, Table 4 below highlights the councils' response that indicates how the councils have addressed these in the preparation of the Local Plan.

Table 4: Issues and Options Consultation: Main Issues and Councils' Response

Issue	Council Response
<p>Housing and Economic Development Needs Assessment (HEDNA)</p> <p>Concerns raised on the accuracy, methodology or outcome of the HEDNA.</p> <p>[404 (7.4%) of responses in total]</p>	<p>The HEDNA has been prepared as a draft in partnership with Aylesbury Vale and Wycombe District Councils both of whom have also consulted on the draft HEDNA. The consultation responses to all three Local Plan consultations have been provided to the consultants commissioned to undertake the HEDNA and to take these into account when updating the HEDNA. Summaries and responses to all three consultations on the draft HEDNA are published separately on the council websites as part of the evidence base.</p>
<p>Green Belt</p> <p>The Green Belt should be protected from development.</p> <p>[4,600 (84.7%) of responses in total related to Green Belt matters]</p>	<p>It is appropriate for the Green Belt to be considered for review as part of the Local Plan as the development needs arising within Chiltern and South Bucks cannot be met within existing built areas outside of the Green Belt or on previously developed land within the Green Belt. In addition the Green Belt has been established in places for over 50 years and so the contribution it makes to the purposes of the Green Belt and the appropriateness of its</p>

	boundaries should be tested to ensure endurance over the plan period. The Green Belt review is also being undertaken in conjunction with Wycombe and Aylesbury Vale district councils as part of the Duty to Co-operate.
<p>Green Belt Options</p> <p>Specific options identified in the Consultation Document should not be developed and remain in the Green Belt.</p> <p>An identified site (not included in the Consultation Document) should be removed from the Green Belt and considered for development.</p> <p>An urban expansion of Slough into South Bucks District in the form of a garden suburb should be considered.</p> <p>[4,600 (84.7%) of responses in total related to Green Belt matters]</p>	<p>All options identified in the Consultation Document will be considered further before decisions are taken as to whether they will be suitable for development taking into account the views expressed in the consultation. The councils are undertaking a Green Belt Assessment Part 2 and an Inner Green Belt boundary review which will consider all proposals put forward as part of previous Call for Sites and by representations submitted as part of the Issues and Options Consultation. Views and evidence submitted where appropriate will be taken into account as part of the Green Belt Assessment and if considered acceptable under Green Belt terms will be considered further under other processes (e.g. Options Appraisal, HELAA and Sustainability Appraisal).</p>
<p>Chilterns AONB</p> <p>There should be no development proposed in the Chilterns Area of Outstanding Natural Beauty.</p> <p>[2,417 (44.5%) of responses in total]</p>	<p>Given that the Local Plan will not be able to meet its development needs and that significant parts of the plan area are covered by the Chilterns AONB it is considered appropriate that development options are included in the AONB and are tested as part of the Local Plan taking into account statutory requirements and national planning policy and guidance.</p>
<p>Infrastructure</p> <p>Infrastructure (e.g. schools, health facilities, public transport and utilities) is currently inadequate and will be exacerbated by new development.</p> <p>[3,147 (57.95%) of responses in generally for infrastructure. Schools – 2,529 (46.57%); Healthcare (GPs and Hospitals) – 2,030 (37.38%); Transport – 1,447 (26.64%)]</p>	<p>The councils are undertaking infrastructure capacity work and engaging with infrastructure and service providers to understand what essential infrastructure will be needed to support development levels to be planned for in the Local Plan. In addition the councils will be considering how new infrastructure should be delivered and funded. This could include the introduction of a Community Infrastructure Levy (CIL) or a charge to be required for certain types of development. In addition new developments may be required to directly provide some infrastructure or make financial contributions to more strategic improvements.</p>

	<p>The councils will also work with the Bucks Thames Valley Local Enterprise Partnership on seeking growth funding from Government and to seek to influence infrastructure providers' own investment programmes. An Infrastructure Delivery Schedule will be prepared alongside the Local Plan which will set out what infrastructure investment is needed to support new development, when this should be provided, by whom and where the funding is expected to come from.</p>
<p>Roads / Traffic</p> <p>Congestion levels are already high and new development will add to road congestion.</p> <p>[2,630 (48.83%) of responses in total]</p>	<p>The councils in conjunction with Buckinghamshire County Council as Highway Authority and with the inputs from other organisations such as Highways England are undertaking a number of Transport Modelling exercises which will model the impact of proposed development on the highway network and test a range of possible mitigation measures (e.g. relief roads, junction improvements, changed traffic management arrangements). The outcome of this work will test the suitability of development options and what mitigation measures will be required to support development going forward. Mitigation measures will inform the Infrastructure Delivery Schedule.</p>
<p>HS2</p> <p>The Plan should take account of HS2 in terms of impact, scale of development and construction.</p> <p>[1,074 (19.78%) of responses in total]</p>	<p>HS2 is proposed to be bought forward by an Act of Parliament and as such will largely be outside the scope of the Local Plan. Depending on timing some mitigation proposals outside the safeguarded area or re-provision or displaced uses may be relevant Local Plan considerations. In addition the councils will seek to take account of construction traffic implications in relation to highway network improvements and potentially the timing of some development proposals. The safeguarded route of HS2 will need to be included on the Policies Map of the Local Plan and some development proposals will need to avoid the safeguarded area.</p>
<p>Flooding</p> <p>Concerns over flooding (actual and risk of) being exacerbated by new development.</p>	<p>The councils are working closely with Buckinghamshire County Council as the lead authority responsible for flooding matters and the Environment Agency and are jointly undertaking updates to Strategic Flood Risk</p>

<p>[1,433 (26.39%) of responses in total]</p>	<p>Assessments (SFRA). The SFRA will be updated as required and taken into account as part of the Local Plan. Development proposals will not be bought forward in areas at risk from flooding or where mitigation measures cannot be introduced to make the development proposal acceptable.</p>
<p>Housing and Economic Land Availability Assessment (HELAA)</p> <p>Concerns of inclusion of specific sites in the HELAA.</p> <p>[424 (7.81%) of responses in total]</p>	<p>The HELAA is published as a draft and is in the process of being updated. The draft HELAA includes sites in the built area or previously developed land in the Green Belt considered suitable in principle by the Council and sites nominated by others such as landowners or developers. Inclusion in the Draft HELAA does not mean that the Council is or is not proposing sites for development but will draw proposal sites from the HELAA into the draft Local Plan after the draft HELAA has been tested further.</p>
<p>Affordable Housing</p> <p>Mixture of opinion: many believe there is no need for affordable housing in the Districts whereas others recognise there is a need for affordable housing locally which needs to be provided as part of the Local Plan.</p> <p>[637 (11.73%) of responses in total]</p>	<p>The HEDNA will quantify the level of affordable housing need within the Plan area using Government definitions. The Local Plan will seek to deliver the level of affordable housing need taking into account planning and environmental constraints, market housing viability where affordable housing is to be subsidised and other opportunities for provision. The Plan will include a rural exceptions policy for affordable housing in appropriate circumstances.</p>
<p>Biodiversity, Wildlife and Trees</p> <p>Areas with wildlife, biodiversity, as part of habitats, trees and woodlands should be protected from development.</p> <p>[1,088 (20.03%) of responses in total]</p>	<p>The councils have commissioned a review of Biological Notification Areas to determine whether new Wildlife Sites should be identified. Wildlife Sites (existing and proposed if coming out of the review) will be protected. In addition if development proposals come forward then local important biodiversity issues will be taken into account which could include protection as open space, promotion of new habitats, transposition or biodiversity off-setting. Protection of trees, woodland and particularly ancient woodlands and protected trees will be a high priority.</p>
<p>Parking</p> <p>There is insufficient parking in (specified town, district or local centres).</p>	<p>Parking supply and demand will be important considerations for the Local Plan both in terms of meeting existing needs within centres, supporting centres' vitality and viability and to support new investment and development</p>

<p>[1,494 (27.51%) of responses in total]</p>	<p>proposals.</p>
<p>Pollution</p> <p>Increased traffic / development will increase the risk of pollution.</p> <p>[452 (8.32%) of responses in total]</p>	<p>Pollution risk will be an important consideration to be taken into account along with the advice of relevant specialist advice as development proposals are considered in later plan stages.</p>
<p>Sports Uses, Open Spaces and Community Facilities</p> <p>Specific objections against the loss of sports pitches/facilities, publically accessible open spaces and community facilities/areas as being included in option areas to be tested.</p> <p>[2,080 (38.3%) of responses in total]</p>	<p>The councils are not proposing the loss of existing sports pitches, open space uses or community facilities even though they may be included in areas to be tested for release from the Green Belt. If land is to be removed from the Green Belt then the plan will need to protect important existing uses from development or ensure that they are re-provided as part of any development proposal.</p>
<p>Consultation Process</p> <p>The consultation documents and evidence base were difficult to understand or the consultation process was inadequate.</p> <p>[81 (1.49%) of responses in total]</p>	<p>The councils have sought to strike the right balance between providing a consultation document that is reasonable in size yet providing sufficient detail to enable informed responses and welcomes feedback on whether the right balance has or has not been struck. The consultation has been carried out in accordance with the councils' Statements of Community Involvement and all relevant national legislation. All feedback will as far as possible be taken into account for future consultation exercises.</p>

8.3 Similarly, in regard to the Preferred Green Belt Options Table 5 below highlights the councils' response that indicates how the councils addressed these in the preparation of the Local Plan.

Table 5: Preferred Green Belt Options Consultation: Main Issues raised and Councils' Response

Issue	Council Response
Housing and Economic Development Needs Assessment (HEDNA)	<p>The HEDNA has been prepared as a draft in partnership with Aylesbury Vale and Wycombe District Councils and where relevant will be updated and consultation responses considered as part of any future review.</p> <p>The latest draft HEDNA sets the objectively assessed housing need for Chiltern and South Bucks of 14,900 dwellings over the plan period of 2014 to 2036.</p>
<p>Consideration of Options outside of the Green Belt.</p> <p>Councils have not fully explored options within the built-up area prior to seeking to release Green Belt.</p>	<p>The Councils have considered options outside of the Green Belt and will continue to do so as the local plan progresses.</p> <p>The Councils have carried out a draft Housing and Economic Land Availability Assessment (Jan 2016) which assessed sites within the built-up areas and previously developed sites within the Green Belt. This showed there is insufficient supply within the urban areas and on previously developed sites within the Green Belt to meet the objectively assessed need.</p> <p>The draft HELAA (Jan 2016) informed the Preferred Options Consultation, this HELAA position has been updated in the subsequent May 2017 version of the HELAA.</p> <p>Further work is ongoing such as a review of employment sites, town centre opportunities and potential for estates renewal which may identify additional sites within the urban areas however the scale of overall need will not negate the need to consider Green Belt options.</p>
<p>Green Belt and Green Belt Options</p> <p>Impacts on the Green Belt, selection of Green Belt Sites and principle of development in the Green Belt.</p> <p>An urban expansion of Slough into South Bucks District in the form of a garden suburb should be considered.</p>	<p>It is considered appropriate to assess and review the Green Belt as part of the Local Plan process. The first stage in determining the appropriateness of any adjustments to Green Belt boundaries was the Buckinghamshire Green Belt Assessment Part 1 carried out by consultants on behalf of the Buckinghamshire authorities. More detailed Part 2 work is being carried out by Chiltern and South Bucks District Councils. The Green Belt Assessment and proposals to adjust Green Belt boundaries have been discussed with Duty to Co-operate organisations and follow a consistent approach across Buckinghamshire.</p> <p>National planning policy requires that local authorities</p>

	<p>boost significantly the supply of housing by meeting the full objectively assessed needs for market and affordable housing as far as is consistent with the NPPF. Local authorities also need to test all reasonable options for development. Through the Green Belt Review the Councils are aiming to protect the overall integrity of the Green Belt by altering Green Belt boundaries only where land does not serve a Green Belt function or where land performs Green Belt functions relatively weakly and where exceptional circumstances apply; this will ensure that the Council can maintain a plan-led approach to development. It is important to note that at this time the 'Preferred Options' are only being consulted on: they are not proposals and are subject to further testing as part of the Local Plan process.</p>
<p>Duty to Cooperate</p> <p>Use the Duty to Cooperate as a way to secure development in areas outside of the District and therefore reduce the impact on the Green Belt.</p>	<p>At the time of the consultation Duty to Co-operate discussions with Aylesbury Vale District Council (AVDC) and Wycombe District Council (WDC) as authorities being within the same Housing Market Area (HMA) as Chiltern and South Bucks, plus all other adjacent authorities, were progressing. In relation to the Buckinghamshire HMA authorities discussions with a view towards formally agreeing a housing distribution across the HMA to include a proportion of housing need from Chiltern and South Bucks to be met in AVDC emerging local plan.</p> <p>The Councils at the time of the consultation had a Memorandum of Understanding (MoU) with the other Buckinghamshire authorities. This was a written agreement that the Buckinghamshire Districts have committed to working under the Duty to Co-operate to ensure the growth needs of the Council areas are appropriately considered within the wider sub-regional context, against the NPPF whilst taking account of any other material considerations so that the collective development needs of the HMA are to be met within the HMA in the most sustainable ways.</p> <p>The MOU set out the various steps the authorities will undertake in order to assess and address the development needs of the Housing Market Area. Paragraph 1 (d) (of the MOU) relates to unmet housing needs, this acknowledges that through the capacity work (such as HELAA) it is likely that there will be insufficient supply within the built-up areas to meet</p>

	<p>the Objectively Assessed Need (OAN) for both Chiltern and Wycombe, which means this need may need to be met in the relatively unconstrained part of the HMA lying outside of the Green Belt and the AONB which will be addressed in the Vale of Aylesbury Plan (VALP). The MOU has been updated (July 2017). AVDC agree that 5,750 dwellings of CDC/SBDC unmet needs can be met (subject to their local plan processes). To arrive at this position CDC and SBDC officers are convinced that AVDC cannot accommodate additional unmet housing need within the emerging VALP.</p> <p>The duty is ongoing and is being informed by the emerging evidence base for the emerging Local Plan (including the updated HELAA and Green Belt Assessment).</p>
<p>Green Belt Assessment Process and Impartiality</p>	<p>In order to inform the review of the Green Belt the Councils have undertaken an Assessment of the Green Belt which has been carried out in two parts.</p> <ul style="list-style-type: none"> • Part 1 – is a County wide study which assessed parcels (areas) of the Green Belt against the purposes of the Green Belt, as defined in the NPPF, and which recommended areas that warranted further consideration as part of Part 2. This was published in March 2016; and • Part 2 – is being conducted separately in each Local Plan area. Chiltern and South Bucks District Councils' draft Part 2 Assessment was published in October 2016, this assessed areas identified in Part 1, Regulation 18 Consultation options, and Site Nominations (including the Call for Sites). The purpose of the Part Two Assessment is to consider whether those areas that would support the Local Plan strategy and objectives, strategic Green Belt implications and where it is possible to identify a revised Green Belt boundary to evaluate against Green Belt purposes. This along with other evidence base work would inform decisions as to whether or not exceptional circumstances exist to remove land from the Green Belt. <p>Part 1 and the Draft Part 2 Assessments have been used to inform the Green Belt Preferred Options Consultation.</p>

	<p>The Councils are updating the Draft Green Belt Part 2 Assessment. The draft Part 2 and the Part 2 Update have been subject to 'critical friend' input from consultants ARUP who have ensured that there is a consistent approach to the way in which sites have been assessed. ARUP has also been commissioned to undertake the Strategic Green Belt Assessment which will inform the final Part 2 assessment.</p>
<p>Chilterns AONB</p>	<p>Given that the Local Plan will not be able to meet all of its development needs and that significant parts of the plan area are covered by the Chilterns AONB it is considered necessary for appropriate development options to be included for testing in the AONB.</p> <p>The Local Plan cannot change AONB boundaries.</p>
<p>Infrastructure</p> <p>Infrastructure (e.g. schools, health facilities, transport and utilities) is currently inadequate and will be exacerbated by new development.</p>	<p>The Councils are undertaking infrastructure capacity work and engaging with infrastructure and service providers to understand what essential infrastructure will be needed to support development levels to be planned for in the Local Plan. In addition, the Councils will be considering how new infrastructure should be delivered and funded. This could include the introduction of a Community Infrastructure Levy (CIL) or a charge to be required for certain types of development.</p> <p>In addition new developments may be required to directly provide some infrastructure or make financial contributions to more strategic improvements. The Councils will also work with the Bucks Thames Valley Local Enterprise Partnership on seeking growth funding from Government and to seek to influence infrastructure providers' own investment programmes.</p> <p>An Infrastructure Delivery Schedule will be prepared alongside the Local Plan which will set out what infrastructure investment is needed to support new development, when this should be provided, by whom and where the funding is expected to come from.</p>
<p>Roads / Traffic</p> <p>Congestion levels are already high and new development will add to road congestion.</p>	<p>The Councils in conjunction with Buckinghamshire County Council as Highway Authority and with the inputs from other organisations such as Highways England are undertaking a number of Transport Modelling exercises which will model the impact of proposed development on the highway network and test a range of possible mitigation measures (e.g. relief roads, junction improvements, changed traffic</p>

	management arrangements). The outcome of this work will test the suitability of development options and what mitigations measures will be required to support development going forward. Mitigation measures will inform the Infrastructure Delivery Schedule and planning requirements for development options taken forward.
<p>HS2</p> <p>The Plan should take account of HS2 in terms of impact, scale of development and construction.</p>	<p>HS2 will be bought forward by an Act of Parliament and as such will largely be outside the scope of the Local Plan. Depending on timing some mitigation proposals outside the safeguarded area or re-provision or displaced uses may be relevant Local Plan considerations. In addition the Councils will seek to take account of construction traffic implications in relation to highway network improvements and potentially the timing of some development proposals. The safeguarded route of HS2 will need to be included on the Policies Map of the Local Plan and some development proposals will need to avoid the safeguarded area.</p>
<p>Flooding</p> <p>Concerns over flooding (actual and risk of) being exacerbated by new development.</p>	<p>The Councils are working closely with Buckinghamshire County Council as the lead authority responsible for flooding matters and the Environment Agency and are jointly undertaking updates to Strategic Flood Risk Assessments (SFRA). The SFRA will be updated as required and taken into account as part of the Local Plan. Development proposals will not be bought forward in areas at risk from flooding or where mitigation measures cannot be introduced to make the development proposal acceptable.</p>
<p>Housing and Economic Land Availability Assessment (HELAA)</p>	<p>At the time of the consultation the HELAA was published in draft and has subsequently been updated. The draft HELAA considers sites in the built area and previously developed land in the Green Belt. The Draft HELAA does not alter the planning status of sites included in it. It is a technical assessment of where sites could and are likely to come forward for development in the plan period based on their suitability, availability and achievability.</p>
<p>Affordable Housing</p> <p>Mixture of opinion: one shared view is there is no need for affordable housing in the Districts whereas others recognise there is a need for affordable housing</p>	<p>The HEDNA quantifies the level of affordable housing need within the Plan area using national definitions and best practice. The Local Plan will seek to deliver the level of affordable housing need taking into account planning and environmental constraints, market housing viability where affordable housing is to be subsidised and other opportunities for provision. The Plan will include a rural exceptions policy for</p>

<p>locally which needs to be provided as part of the Local Plan</p>	<p>affordable housing in appropriate circumstances. Part of Chiltern and South Bucks general housing need (including affordable housing need) has been agreed to be accommodated in the Vale of Aylesbury Local Plan outside the two districts. Where this occurs the Councils have agreed in principle with Aylesbury Vale District Council (July 2017 Memorandum of Understanding) that the affordable housing element will be made accessible to households in affordable housing need from Chiltern and South Bucks.</p>
<p>Biodiversity, Wildlife and Trees</p> <p>Areas with wildlife, biodiversity, as part of habitats, trees and woodlands should be protected from development.</p>	<p>The Councils have commissioned a review of Biological Notification Areas to determine whether new Wildlife Sites should be considered or areas protected from development. Wildlife Sites (existing and proposed if coming out of the review) will be protected. In addition if development proposals come forward then local important biodiversity issues will be taken into account which could include protection as open space, promotion of new habitats, transposition or biodiversity off-setting. Protection of trees, woodland and particularly ancient woodlands and protected trees will be a high priority. In addition the Housing White Paper 'Fixing our broken Housing Market' published by Government in February 2017 suggested that when Green Belt is released as part of the Local Plan 'offsetting' by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land could be provided. This is something that the Councils will consider.</p>
<p>Parking</p> <p>There is insufficient parking in (specified town, district or local centres).</p>	<p>Parking supply and demand will be important considerations for the Local Plan both in terms of meeting existing needs within centres, supporting centres' vitality and viability and to support new investment and development proposals.</p>
<p>Pollution</p> <p>Increased traffic / development will increase the risk of pollution.</p>	<p>Pollution risk will be an important consideration to be taken into account along with relevant specialist advice as development proposals are considered in later plan stages.</p>
<p>Sports Uses, Open Spaces and Community Facilities</p> <p>Specific objections against the loss of sports pitches/facilities, publically accessible open spaces and</p>	<p>The Councils are not proposing the loss of existing sports pitches, functional open space uses or community facilities even though they may be included in areas to be tested for release from the Green Belt. If land is to be removed from the Green Belt then the plan will need to protect important existing uses from development or ensure that they are re-provided as</p>

<p>community facilities/areas as being included in option areas to be tested.</p>	<p>part of any development proposal. It is likely that any new developments over a certain scale will have to incorporate open spaces to serve the development; these standards will be based on an up to date assessment of existing provision (based on quality, quantity and accessibility).</p>
<p>Consultation Process</p> <p>The consultation documents and evidence base were difficult to understand or the consultation process was inadequate.</p>	<p>The Councils have sought to strike the right balance between providing a consultation document that is reasonable in size yet with sufficient detail to enable informed responses. The Councils welcome feedback on whether the right balance has or has not been struck and other suggested improvements. The consultation has been carried out in accordance with the Councils' Statements of Community Involvement. All feedback will as far as possible be taken into account for future consultation exercises.</p>
<p>Scale/Distribution of Recent Development</p>	<p>The Local Plan will need to identify sustainable development options to meet needs taking into account the scale of development and implications for individual settlements.</p>
<p>Loss of agricultural land</p>	<p>The Councils will ensure that the highest quality agricultural land is protected in the Plan and that viable Grade 1 or 2 farm land is as far as possible protected.</p>
<p>Design</p>	<p>Details such as built form design are not being considered at this stage. The consultation tries to establish whether the principle of development should or should not be acceptable, and recognises that for those options to be taken forward a greater level of more detailed work will be required. Once the plan is adopted and proposal sites are allocated the Councils can produce further guidance if needed and for larger or more complicated sites a Development Brief in consultation with local communities and other stakeholders, in order to set out the parameters for development; this may include density, layout, appearance and landscaping.</p>
<p>Density</p> <p>Preferred Options are too dense</p>	<p>The density of the options shown is indicative and subject to further review. The Councils will have to try to maximise the density of land in order to make the most efficient use of the land and to maximise limited opportunities to best meet objectively assessed development needs. Density should not come at the cost of good design or lower standard of amenities, and in considering this other factors such as appearance, layout, and access are fundamental to the suitability of any potential development. These factors will be determined in detail</p>

	at a later stage once the principle and scale of development has been established through the Local Plan process and when a planning application is considered.
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Appendix 1

LIST OF 'SPECIFIC CONSULTATION BODIES'

The Coal Authority

The Environment Agency

The Historic Buildings and Monuments Commission for England

The Marine Management Organisation

Natural England

Network Rail Infrastructure Limited (company number 2904587)

Office of Road and Rail

Highways England

Adjoining Local Authorities, such as Aylesbury Vale District Council, Buckinghamshire County Council, Dacorum Borough Council, London Borough of Hillingdon, Royal Borough of Windsor and Maidenhead, Slough Borough Council, Three Rivers District Council, Wycombe District Council, and Hertfordshire County Council.

Adjoining Town and Parish Councils

Buckinghamshire Healthcare Trust

Buckinghamshire County Council Public Health

Bucks Natural Environmental Partnership

Buckinghamshire and Thames Valley Local Enterprise Partnership (LEP)

Bucks & Milton Keynes Natural Environment Partnership

Buckinghamshire County Council – Education

Buckinghamshire County Council - Minerals and Waste Policy

Buckinghamshire County Council - Strategic Flood Management

Chiltern Clinical Commission Group

Chiltern Railways

City of London

Civil Aviation Authority

Classification: OFFICIAL-SENSITIVE

Cross London Rail Links Limited

Department of the Environment, Food, and Rural Affairs (DEFRA)

Department for Education and Skills

Department for Transport (Railways Section)

Department of Health (through relevant Regional Public Health Group)

Department of Trade and Industry

First Great Western

Ministry of Defence

Department of Work and Pensions

Department for Culture, Media and Sport

English Heritage

English Nature

Environment Agency

Forestry Commission

Garden History Society

Greater London Authority

Health and Safety Executive

Homes and Communities Agency

Mayor of London

Ministry of Defence

Mobile Operators Association

National Grid

NHS England (Thames Valley)

Planning Inspectorate

Primary Care Trust

Relevant telecommunications companies

Classification: OFFICIAL-SENSITIVE

Classification: OFFICIAL-SENSITIVE

Relevant electricity and gas companies

Relevant sewerage and water undertakers - Thames Water Utilities Ltd, Affinity Water

Sport England

Secretary of State for Transport

Transport for London (TfL) - Commercial Development

Town and Parish Councils within the Districts

Classification: OFFICIAL-SENSITIVE

Appendix 2

LIST OF 'GENERAL CONSULTATION BODIES'

The Council engaged and consulted with the general public, including hard to reach groups as identified in its Joint Consultation Database and Local Employers Consultation Database falling into the broad groups listed below:

- Amenity groups
- Chambers of Commerce
- Local Employers
- Housing Associations
- Secondary Schools and Colleges
- Utilities
- Neighbourhood Watch Groups
- Developers and Planning Agents
- Gypsies and Travellers
- Travelling Showpeople
- Rural community
- Local Cultural, Sport and Recreational Groups