

David Waker

From: Chec Planning Ltd <checplanningltd@gmail.com>
Sent: 19 February 2019 11:40
To: David Waker
Cc: Chalfont PC Helen
Subject: Re: Simon Avery comments on Chalfont St Giles Neighbourhood Plan HRA/SEA

David

Thank you for your email.

I will accept it in this instance as it is a matter of clarification.

Please can you publish your email and my response on the website, for information only. I am not inviting further response from any party.

Regards

Janet Cheesley

From: [David Waker](#)
Sent: Thursday, February 14, 2019 12:21 PM
To: '[CHEC Planning Ltd](#)'
Cc: jdbcsgneighbourhoodplan@btinternet.com ; '[Clerk to Chalfont St Giles Parish Council](#)'
Subject: Simon Avery comments on Chalfont St Giles Neighbourhood Plan HRA/SEA

HI having read Mr Avery's comments on the SEA and HRA documents produced by the district council in relation to the neighbourhood plan I thought I should comment. However feel free to ignore my comments if you feel it's inappropriate for the district council to comment at this stage.

Mr Avery seems confused and is summarising the HRA wording incorrectly the HRA is assessing the potential impact of the neighbourhood plan on the environment and not the existing Core Strategy Policy which itself was subject to an HRA. In relation to clause 9 admit the wording could be clearer but essentially this is saying that the Neighbourhood Plan policy – the one the HRA is assessing is in line with the core strategy policy and the Neighbourhood Plan policy aims to minimise the impacts of small sites in the AONB etc. Wording of clause 9d would read better if the word 'that' was prefixed with the word 'in' and followed with the word 'it'.

Again Mr Avery is incorrect in his wish for the SEA document to refer to Core Strategy Policy CS9 as the assessment is looking at the potential environmental effects of the neighbourhood plan over the existing planning basis. The screening opinion at clause 2f refers to heritage assets which would include conservation areas but gives an example 'such as listed buildings' it is not intended to be an exhaustive list and as such despite his concerns potential impact of the neighbourhood plan policies on the conservation areas have been assessed. The assessment concludes that there may be a limited impact and so it is correct under the third column to state would there be a significant environmental effect 'N'.

Core Strategy Policy CS9 does permit rural exception schemes , however whilst is unlikely there would be several applications in the same location Policy CS9 does not limit subsequent affordable housing applications and as such there is no limit on the number of sites coming forward and no conflict with the neighbourhood plan policy.

Mr Avery has selectively quoted from the NPPF (para 134c and d) but has missed the paragraph which specifically permits rural exceptions schemes in the Green Belt in accordance with a development plan policy. I.e. para 145f.

regards

David Waker
Senior Planner (Policy)
Planning Policy Team
Chiltern District and South Bucks District Councils