

Core Strategy for Chiltern District

Chiltern District Council - Response to Inspector's Questions [ID/4]

MAIN MATTER 2: Spatial Strategy

DATE: 18 March 2011 (Made Available 22 March 2011)

Final

The following Paper sets out the Council's response to Section 3, 'Main Matter 2: Spatial Strategy' of the document 'Inspector's Main Matters and Questions' ID/4. The Paper has been structured to include the specific questions raised by the Inspector and the Council's detailed response to them.

3.1) Over-arching issue: is the spatial strategy clearly expressed, does it derive from a proper consideration of reasonable alternatives and is it justified by evidence?

3.2) I have seen no significant evidence to suggest that the 4 spatial scenarios (elsewhere referred to as Options) set out in the Core Strategy Options Paper June 2008 excluded any reasonable alternative and I do not intend to explore further matters prior to that Paper. I regard the 4 Scenarios in the 2008 Paper as the starting point.

3.3) I sought some preliminary clarification from the Council and expressed some concern about the description and evolution of the spatial strategy in my 2nd Note to the Council (2 February 2011). The Council's initial response is in CDC/2(9 February 2011). Both these are available on the Examination page of the Council's website. As requested, the Council has provided (CDN111) a summary of the reports to the Council's committees/cabinet and full Council at each stage of the evolution of the strategy since the June 2008 publication. Contrary to

what is stated in the Core Strategy, the Council now accepts that the chosen locational strategy is more closely related to Scenario/Option 1 of the June 2008 scenarios than option 3, which was approved by the Cabinet in 30 September 2008. The key Council decisions resulting in this change are summarised in CDN11.

Q3.4) The Council will be proposing some changed text to clarify the description of the chosen strategy. Q: Does this text appropriately explain what the chosen strategy is meant to be? Is it consistent with policy CS1?

Q3.5) Policy CS1 refers to the four main, and most accessible settlements. The Chiltern Accessibility Plan (B10 in CDN009) shows that Great Missenden has a higher accessibility index at its centre than Little Chalfont. How has most accessible been assessed in choosing the main settlements in CS1/CS2? Is the description of the selected settlements justified?

CDC Response:

The Council's consideration of the potential for significant development in Great Missenden is set out on page 15 of the June 2008 Options paper. (CDN049) Whilst the text relates to a scenario which was not accepted (Scenario 2) the two points made there are relevant in the context of considering any strategy. The points are that of the four most accessible settlements, Great Missenden alone does not have a District shopping centre or a significant range of central facilities. Also it is the only one of the four settlements that is in the Chilterns AONB. Accordingly significant additional development at Great Missenden has never been part of any scenario or of the CS as it has developed.

In earlier stages of evolution of the CS, Little Chalfont was dealt with as part of Greater Amersham, one of the two most accessible settlements, but it is now listed separately as a result of local representations regarding its local identity (Little Chalfont was only relatively recently constituted with a separate

parish council). Appendix B10 of CD009 shows that Little Chalfont itself is only slightly below Great Missenden in terms of accessibility and, on this basis, its role in the strategy is considered to be appropriate. It also has a greater range of facilities, both when taken together with Amersham, and when considered separately, than Great Missenden.

Q3.6) In September 2008 the Council had recognised that some Green Belt sites might be required to deliver the spatial chosen strategy (Scenario 3). In April 2009 the Council decided that it was no longer necessary to contemplate sites in the Green Belt because there were sufficient sites to deliver the SEP requirement of 2,900. (CDN11 Table 1). In September 2010 the Council decided to reduce provision to 2,400, in part, because of land supply constraints.

Q3.7) In September 2010, did the Council review the chosen strategy including the constraints it was imposing on supply (such as by not contemplating development in the Green Belt)? Where is any such assessment set out? What are the Council's reasons now for not considering any housing sites in the Green Belt?

CDC Response:

The key papers in the decision-making process have been supplied as CDN111. The reservations of Cabinet about developing Green Belt and the resolution to develop the strategy in such a way as to minimise the impact on the Green Belt are set out in the minutes of the meeting held on 30 September 2008. Developing the Green Belt was seen as a last resort, only being triggered in the future if land in the urban areas did not come forward. There is of course a presumption in national policy against development in the Green Belt and the Government in its document "The Coalition: our Programme for Government" has stated its intention to maintain the Green Belt. The Council does not accept that it is reasonable to suggest that constraints are being put on supply by adhering to national policy. Rather it might be more appropriate to question (as the Council has done) whether the supply sought is reasonable in an area that is largely Green Belt and which

has the additional constraint of most of its area being designated as AONB, another national policy designation. It is clear (and PPG2 advises) that exceptional circumstances would have to exist to trigger a review of Green Belt boundaries. Such circumstances do not exist. The South East Plan did not recommend any Green Belt review or release in Chiltern District and the Council does not consider it necessary to release Green Belt land to accommodate housing or any other development.

Q3.8) Is the Council's evolved choice of urban concentration as the locational strategy justified by evidence and has it been the subject of Sustainability Appraisal which has informed the development of the strategy?

CDC Response:

The adopted strategy is in line with national policy set out in PPS3. and has taken account of the extensive evidence in the SHLAA. Scenario 1 – Urban Concentration was the subject of Sustainability Appraisal when the four strategic options were considered by consultants Carter Jonas in June 2008. The analysis is reproduced as part of Appendix 3 in the Council's final SA Report (CDN085). In addition, the published core strategy as a whole has been the subject of SA as set out in that same document.

Q3.9) Has there been a change in locational strategy (or in the practical consequences flowing from how the strategy is expressed) between the Consultation Document March – April 2010 (CDN084) and the publication/ submission version, now that housing numbers are not given for individual settlements?

CDC Response:

There has been no change in the locational strategy between the Consultation Document March – April 2010 (CDN084) and the publication / submission version.

Q3.10) Does policy CS2 provide a sufficient strategic spatial steer for the scale of housing in different settlements? Would figures for individual settlements make any difference to the scale of development that occurs, bearing in mind the strategic allocations made and reliance on SHLAA sites within the urban areas?

CDC Response:

At earlier stages of preparation of the CS, the Council considered setting out figures for individual settlements. Given that it cannot be sure which of the SHLAA sites will come forward, the figures for individual settlements have not been taken forward into the submitted version of the CS. In context, less than half the SE Plan allocation of housing remains to be allocated out of what is in itself is a relatively low allocation. There is no requirement to allocate housing numbers to individual settlements, and in this context it is not considered that the assignment of such figures would add to the effectiveness of the spatial strategy.

Q3.11) Does policy CS2 achieve what the Council intends? The Council will be proposing a change to the policy to refer to the strategic housing MDS sites. Does policy CS2 (in the submitted document and as proposed to be amended) fulfil the spatial strategy expressed in CS1 (of urban concentration)?

CDC Response:

The proposed change to Policy CS2 is set out within CDN117

Q3.12) Is the balance between the urban areas and the rest of the district appropriate? What has informed this split?

CDC Response:

It is expected that three quarters or more of new dwellings will be built in the four settlements of Amersham, Chesham, Chalfont St Peter and Little Chalfont. These are the most accessible settlements in the District that are not in the Chilterns AONB. This balance is considered appropriate. The split

takes account of housing construction and permissions in the villages excluded from the Green Belt.

Q3.13) Would any settlement or parish, particularly Chalfont St Peter or Little Chalfont, have a disproportionate amount of new housing over the plan period or be affected by disproportionate impacts from developments?

CDC Response:

The supply of land for housing will be drawn from land which already has planning permission, from sites in the SHLAA and from small windfall sites. It is expected that three quarters or more of new dwellings will be built in the four settlements of Amersham, Chesham, Chalfont St Peter and Little Chalfont. There is a limited number of potential sites in the latter two communities. The largest sites in each community are identified as strategic housing allocations in Policy CS6. Aside from these, there are a number of smaller sites which might come forward. A comparison of the maps on pages 18-26 in the SHLAA Update (CDN115) illustrates that development potential is reasonably proportionate to the size of settlements.