

APPENDIX G



To all members of the East Bucks. Area Planning Committee, (EBAPC)

cc Bucks. Council - Monitoring Officer

cc Bucks. Council - Corporate Director for Legal Services

By email: Tuesday, 12th December 2023

Ref: PL/22/4074/FA, St. Leonard's Parish Centre, Glebe Way, Chesham Bois, Bucks., HP6 5ND. Redevelopment of three parcels of land to build a new multifunctional Parish Centre with cafe, separate day nursery building, replacement rectory with detached garage, two outbuildings to provide a prayer room and substation/bin and bicycle store, new car park, fencing and landscaping, to include a footpath leading to a fire pit with surround seating.

The application to build an enormous conference centre and huge car park in the centre of the Chesham Bois Conservation Area on a site surrounded by Chesham Bois Common, (a popular recreational space and haven for wildlife), is a significant threat to the local environment and the reason why Chesham Bois Parish Council is being pro-active and submitting a further letter to the Committee, having had our documented concerns summarily dismissed and our request to speak at the meeting to be held on 13/12 declined.

We are acting on behalf of the majority of residents who object to the sheer scale of the proposal and in defence of the environment at the heart of Chesham Bois, where there is a wealth of biodiversity both on and surrounding the proposed site, which is at risk of devastation if this development was allowed to proceed.

A limited discussion about only a few issues took place at the previous EBAPC meeting held on 17/10 and documents produced for that occasion lacked important information. A development of the proposed, significant scale merits robust scrutiny and full consideration of all relevant details.

The Parish Council submitted notice on 20/11 that we would take action to fill gaps in terms of relevant information and acted as swiftly as possible to submit new, material information on 7/12. However, we have since noted the intention to limit consideration of this proposal on 13/12 to only one aspect of the application, (Chiltern Beechwoods SAC), and, furthermore, that voting is likely to be restricted to those members of the committee members who attended the prior meeting on 17/10, even though material, new information has since been submitted and a webcast of that meeting was published. The Buckinghamshire Council Constitution states that it aims to 'ensure that decisions are efficient, transparent and accountable to local people', (Section 1.1), and so we trust that all committee members elected to represent local people will be able to participate in the further consideration of this application.

As a representative of the Parish Council is not permitted to speak at the meeting on 13/12, we wish to highlight our key concerns for the benefit of all the committee members, listed below.

- 1. Documents submitted for consideration on 17/10 reference frequent reliance upon the views of a Planning Inspector but only when the application was considered on appeal early last year.** The previous application did not include all relevant details such as site capacity events; security; traffic generation based on actual data; full details of local ecology and protected species; biodiversity metrics; usage and fire risk relating to a proposed fire pit; or required access to waste drains which run underground from the Old Rectory into a soakaway pit into the site, in the area proposed for a large car park. Also, the potential impact on Chesham Bois Common which surrounds the site, was not considered.

Note: If this application were to progress to appeal again, Planning Inspectors would not be restricted by previous appeal reports, especially when new information is provided and new laws/guidelines have emerged. In addition, the committee could reference all or some of the same reasons previously referenced to decline this application.

2. Ecology

A. The report produced by Future Nature WTC, a subsidiary of Berks., Bucks. and Oxfordshire Wildlife Trust, (submitted for your information on 7/12), contains important, new information which has yet to be considered by the committee and the Bucks. Ecology Officer. The expert report benefits from local knowledge; highlights issues that have been overlooked, (including the potential impact on Chesham Bois Common); items that do not meet current planning requirements; and references current obligations with regard biodiversity net gain which have not been met.

B. Reports submitted by Bucks. Badger Group on 12/10 have yet to be considered by the committee and the Bucks. Ecology Officer. As reported, proposed mitigation measures are not feasible.

Protecting the environment has become critically important since the previous application was considered on appeal and *NPPF (2021) Paragraph 180a states "When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused."* We would contend that the sheer scale, hours of operation and use of the proposed development would cause irrevocable and significant harm to biodiversity in the immediate and local vicinity.

3. **Traffic reports** submitted with the application reference out of date categories; do not include current baseline information or full site capacity events; or proposed Sunday worship gatherings; and the fact that people might use the proposed café independent of any site events was dismissed as not being a potential use. The Parish Council arranged for a baseline traffic monitoring survey (submitted to the Planning Dept. on 7/12) which showed the current volume of traffic to be lower than previously estimated and negligible during the evenings and on Sundays. The independent consultant advised that the scale of development was typical for a site with 100 houses and, for a full site capacity event, reported that parking requirements would be for 162 vehicles, in excess of the planned 114. As the potential increase in traffic volume would be so significant it would be reasonable to consider that the following apply:

NPPF 110. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: ... b) safe and suitable access to the site can be achieved for all users; (The Parish Council is not minded to permit the required access across its land)

NPPF 111. Development should be... refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe

NPPF 112. Within this context, applications for development should: ...c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles...and respond to local character and design standards... (The roads are peaceful, quiet side roads and only one-way when parking bays are occupied:- Glebe Way, Bois Lane, North Road and South Road).

4. **Chiltern Beechwoods SAC.** On 17/10 the committee requested objective, high/medium and low risk scenarios to be presented and this request has not been fulfilled. Only an individual's subjective view has been submitted and, importantly, no full site capacity has been considered, no visitor numbers have been included and no consideration given to people visiting the site for long conferences, (e.g. 2 to 3 days).

Reference is made to a Bucks. Council consultation with Natural England (NE) on 19th October 2023, after which NE expressed a view that "Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutory designated sites and has no objection." However, NE was not provided with relevant impact scenarios; the plans available at that date were insufficiently detailed; and NE further qualify the statement elsewhere in the letter. .

5. **There is no overriding public interest to take into consideration**, given the abundance of amenities in the immediate vicinity of the proposed site which include numerous cafés; the existing parish church; other

local venues used for worship; community facilities such as the large, multi-functional Chilterns Lifestyle Centre, (which opened after the first planning application was submitted and is within a 12 minute walk from the existing Chesham Bois parish centre); and different options for hiring large venues.

And, finally, the Case Officer has proposed no less than 26 material conditions for this planning application, an excessive number, and we would question how many could actually be monitored or enforced.

We trust that all members of the committee will fully consider all the information submitted since 17/10 and decide to refuse this application to build an enormous conference centre and huge car park in the middle of the Chesham Bois Conservation Area, taking into account the potential, irrevocable impact on Chesham Bois Common as well as the residents of adjacent property, The Old Rectory.

Yours faithfully

A Dealey

Annette Dealey
Clerk
Chesham Bois Parish Council