

CESHAM COMMUNITY RESPONSE

TO THE

CORE STRATEGY PROPOSALS

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CHESHAM COMMUNITY RESPONSE TO THE CORE STRATEGY PROPOSALS

1. GENERAL COMMENTS

It is proposed to place 650 new dwellings in Chesham by 2026. Out of this total, 267 properties have already been built or have planning consent. Under the Core Strategy it is proposed that Chesham should absorb a further 383 dwellings and, generally speaking, the maximum number of “affordable homes” within that requirement would be about 153 (40%).

650 new dwellings will, in theory, bring an influx of almost 2,000 people to the town, with the potential of, at least, 1,000 additional vehicles.

The Chesham Hospital site in Waterside is expected to accommodate 55 dwellings under Policy CS11.

The Amersham and Wycombe College site on Lycrome Road has been allocated to accommodate 57 dwellings under Policy CS12.

Both of these sites are discussed below.

Our general comments are as follows:-

2. WHY IS CHESHAM GENERALLY UNSUITABLE FOR ADDITIONAL HOUSING/DEVELOPMENT VOLUME

On the basis of factual information already available, the demographics of Chesham differ from the rest of the Chiltern District. The houses in Chesham are, in general, smaller than in other parts of the District and the proportion of socially rented houses is about double the average for the rest of the Chilterns.

The 2001 Census revealed these imbalances and the new properties built in Chesham since then have only exacerbated the position. The bulk of the new dwellings have been classified as small, in contrast to the rest of the Chilterns, and a higher proportion of the new social housing has also been placed in Chesham. There is, apparently, no policy of giving Chesham people any priorities in the allocation of housing so, as the bulk of social housing is already in Chesham, the overall effect is to concentrate small and low income families in the town, with undesirable health and educational consequences, thus reducing the viability of Chesham as a retail centre and concentrating deprivation within the town.

Chiltern District Council should devise a policy whereby social housing for rent could be spread more proportionately throughout the District rather than being concentrated in Chesham in order to ameliorate the effects mentioned above. Provision of social or affordable housing in areas other than Chesham matches the third strategic spatial issue mentioned in 4.5 of the draft Core Strategy document.

New development in the Hivings Hill area has, in the past, led to a reduction in water pressure. There is, therefore, a question as to whether or not any new development can be placed into Chesham whilst still complying with Policy CS37 which intends to avoid any over abstraction of water. On the basis of past factual information it will be difficult to ensure that abstraction can be managed sustainably.

3. TRAFFIC

There is already serious traffic congestion in the centre of Chesham, with resultant pollution levels that exceed legal limits. Since the town is situated in a valley with only one thoroughfare there is regular congestion which has already been recognised by Buckinghamshire County Council, particularly at the junction of the A416 with Chartridge Lane in the town centre.

Account should be taken of the increase in traffic flows which will arise from developments in respect of which consent has already been given. We have yet to experience the increase in traffic which will be created by the construction of 45 sheltered apartments plus a manager's flat by McCarthy & Stone on the site of 7-15 Bellingdon Road. In considering traffic volumes, account needs to be taken with regard to visitors and service vehicles as well as the residents themselves.

In 4.5 of the Core Strategy Statement, the first strategic issue indicates that any new dwellings need to include the addition of appropriate infrastructure necessary to support these dwellings.

Placing such a high volume of new development within Chesham will clearly contravene Policy CS38 which requires that planned development in the Chiltern District will not adversely impact the transport network. Additional traffic flow will automatically create congestion at the junction of the A416 with Chartridge Lane without the construction of a town centre bypass. At the same time, any proposed addition to the road infrastructure such as a town centre bypass would, of necessity, decimate the surrounding Area of Outstanding Natural Beauty so this too would contravene the Core Strategy Policy of Green Belt preservation.

4. THE CHESSE AND CHESHAM

It has been reported that there is already too much sewage in the area for the infrastructure to cope. Thames Water periodically apply for permission to continue to allow their storm tanks to overflow. Statistical information demonstrates that the tanks were allowed to overflow 18 times in one year. The relevant data concerning storm sewage surcharges in to the River Chess is attached to this report.

5. WATER SUPPLY

Before any further development takes place it will need to be established that there is sufficient infrastructure within the District to cope with any additional demand on water supply. There is some concern that we are sharing our water supply with new Estates in Aylesbury and, as a consequence, the availability of water resources within the Chiltern Area as a whole could decline.

6. WATER RUN-OFF AND THE RISK OF FLOODING

Due to the nature of the valley in which the town lies, heavy rainfall on the surrounding hills can frequently cause flooding in the town centre. This problem is being exacerbated by building developments on the hills thereby replacing the surfaces which would normally absorb rainfall.

This is evident from the regular flooding which occurs in The Vale, the town centre itself, and Hivings Hill. The readily available maps showing the flood plain of the River Chess do not take into account the regular flooding which occurs by general water run-off into the town centre itself.

This particular issue has been discussed at length by the Planning Inspectorate as a problem which needs to be addressed before any further properties are to be constructed on Hivings Hill but this principle could apply to the town as a whole. See the Inspector's reports on the appeals: reference CH/2007/1778/FA ((24/6/2008) and CH/2008/0322/FA (21/05/2009).

7. CONTRIBUTION FROM "IMPRESS THE CHESS"

This response is written on behalf of the Impress the Chess group which is convened by Chesham Town Council but includes representatives from a number of local environmental groups as well as representatives from the Chiltern AONB and Chiltern District Council. Its remit is the improvement of the river Chess within the boundaries of the Chesham Town but it also has representation on the River Chess Association looking at the Chess as a whole.

We would like to thank the Council for this opportunity of commenting on the Draft Core Strategy. We, however, would suggest that with such a wide ranging and important document as this that a consultation period of some six weeks, especially with the Easter break within it, is not really long enough to deal with all the issues.

1. Firstly we would like to welcome the support that the core strategy gives to the AONB Management Plan (e.g. in Policy CS22) and to Biodiversity in Policy CS35. We would wish to underline the importance of Chalk Streams such as the Chess as mentioned in Para 19.8. These are an internationally rare habitat and as such it is vital that the authorities in this area maintain them to the highest standards. The Strategy does not mention working together with the Environmental Agency or with riparian landowners to achieve this.

Some of the pressures which effect the implementation of preserving the habitats are dealt with below.

2. The building of additional houses in the District will increase the amount of water abstraction from the aquifer. Effectively the whole of the Chilterns is already over abstracted. The Water Framework Directive published by the Environment Agency states that the Colne catchment area (including the Chess) "can be identified as an area of severe water stress". Water is already being imported into the area by Veolia from Graffham Water. Recognising that the specification of the numbers of new homes in the Chiltern District is not in the remit of the Council then the impact of new buildings must be reduced to a minimum.

The Strategy is through to 2026 and, in that time scale, techniques for achieving reductions in water use may be developed. Those available now – even if not widely yet applied - should be specified in the design of new builds. We are thinking of such techniques as rainwater harvesting for use for “grey water” functions such as toilet flushing etc. The use of soakaways for drainpipes rather than routing run-off into the drainage system will benefit the aquifer.

We realise that the Strategy mentions water efficiency measures in Policy CS3 and in para 6.2 but we do not think that this has been given sufficient weight nor has it been spelled out that this will be under review during the period of this strategy as new techniques are developed.

3. Associated with new building there will be associated roads and other hard surrounds. These will limit again the amount of rainfall seeping through to the aquifer, but they also increase the amount of water being routed to the sewage works which in Chesham’s case is some way down stream.

This has two effects:

- a. The amount of water reaching the upper part of the Chess is reduced.

This section of the Chess is subject to low flows and to drying up during periods of low rainfall. This effect is likely to increase with climate change. To mitigate against that we suggest that as far as possible new areas of land are not covered with hardstanding or roads. The two main areas suggested for new housing in Chesham are already structured with driveways, car parking etc. so this should not be a problem there but other areas to be designated should be looked at in the light of the above.

- b. The quantity of water that the sewage works have to deal with is increased. Effective sustainable urban drainage has been mentioned in Policy CS3. The effect on the sewage works is also discussed in para 22.4. Although Thames Water seems to have a relaxed approach to the new buildings it is a fact that the current capacity of the sewage works cannot cope with sustained high rainfall or storm conditions. The way of handling this is to discharge untreated sewage into the river Chess. Further buildings and hardstanding discharging into the drainage system can only increase this problem.

Note that the discharge of untreated sewage is allowed under EA rules but it is not acceptable in a delicate ecosystem such as a Chalk Stream. In other rivers such discharge will occur when the river is high (due to the same rain as overwhelms the sewage treatment plant) and so is diluted. In a Chalk Stream the level of the river is much dependent on the rainfall weeks earlier seeping into the ground. So a discharge can be into a low flowing stream when a sudden storm follows a time of low rainfall – quite common in summer.

- c. Overall this means that new builds should not be on previously “green” areas such as back gardens or other open spaces.

One possibility of looking for new housing land is to look at the balance of industrial land use in Chesham as against that of housing. We are not suggesting that the land use for employment be reduced. However, the type of buildings currently required for industrial and office use is on the whole smaller than in the past. There are some large old industrial buildings such as the one in Waterside near the junction with Red Lion Street which could be released for housing. Offsetting this is the conversion, as has already taken place of some houses in Mineral Lane into offices so maintaining the employment balance.

4. The following paragraphs deal with individual items in the Strategy:

- a. We welcome the statement on page 20 about healthy Chalk Streams and hope that some of the ideas expressed above will contribute to this.
- b. We welcome the statement in para 6.2. III about maximising the use of water. However, there does not seem to be much in the document about implementing this.
- c. Para 7.3 – we agree that undeveloped land should not be built upon not only for the preservation of the natural environment but also for the implications to the water cycle as outlined above.
- d. We welcome Policy CS3 with its references to water and drainage. We would like to see these ideas expanded.
- e. We welcome Policy CS22. While there are plans to monitor water quality etc. the policy is light on achieving this.
- f. We welcome Para 15.5 which speaks of protection of the river from inappropriate development. One policy which was in a previous local plan was to not allow any development which prevented access to the river by the public (except in for wildlife conservation). The local streams are important for people as well as wildlife.
- g. The statements in para 19.1 about protecting water from pollution are important
- h. We welcome the recognition of the importance of chalk streams in paras 19.7 to 19.10 and Policy CS35. The streams are also dependant on their catchment areas as recognised by the BAP Biological Opportunity Area of the Chess by the Bucks and Milton Keynes Biodiversity Partnership.
- i. The control of abstraction of water is very important as recognised in Policy CS37.

- j. We would like to see in Policy CS39 further expansion of item *h* to talk about minimisation of water usage and drainage.
 - k. We have already commented on Para 22.4. The need for an adequate sewage treatment plant on the Chess must be sorted out before any increase in water usage or drainage.
5. One general point to aid readers who are not planners it would have been useful to have had a glossary of acronyms. Although most are explained on the first time of use it would be good to be able to refresh the meaning in a glossary. Not all are explained first time (AMR is used on page 75 and spelled out on page 91).

8. HOSPITAL HILL

Chesham Hospital was originally built in October 1869 on land provided by Lord Chesham so that his legacy would be an ongoing health facility within the town. At the time of the bequest, there must have been a condition applied.

If this particular site is to be turned over to residential use then there is clearly a breach of any existing Covenant and premise under which the land was originally donated.

Whether or not a change to residential use is within existing Law will, therefore, need to be examined.

Planning application number CH/2004/2239/OA was refused in March 2005. At that time the Primary Care Trust said it was, in law, permitted to sell the site. That is not the same as the Council being legally entitled to permit a change of use.

That original application was loosely “suitable to provide over 40 small dwellings (75m square)”, but now the number has jumped to 55.

There has already been a considerable amount of high density development within the Waterside area of the town. Any additional housing would be to the detriment of existing residents as the traffic is already at dangerously high volumes and the road is extremely narrow.

Hospital Hill is an unadopted private road at the present time so this position would also need to be reviewed. In application CH/2008/0133/FA it is stated that 27 3 bed dwellings would generate 214 daily vehicle movements per day, thereby requiring a contribution of £54,000 to the A416 Congestion Management Corridor Scheme. Where does this money go? It is certainly not spent on the roads in Chesham. How much of a contribution would 55 dwellings generate?

The school in Waterside has recently had its number of pupils significantly reduced and the school has been split to accommodate a family centre. Clearly, new housing is likely to bring in new school age children and there is no longer the potential to expand the capacity of the existing school to accommodate an increase in pupil numbers.

9. THE PROPOSED SITE OF THE AMERSHAM AND WYCOMBE COLLEGE ON LYCROME ROAD

It is envisaged that this site could accommodate 57 additional dwellings.

There is a paradox in dispensing with an educational facility on the north end of the town whilst accepting that the town must accommodate additional dwellings which, in turn, will produce more school children with a need to be educated.

11.4 of the draft Core Strategy is, therefore, incorrect as it is unlikely that the Campus will become surplus to educational requirements. Furthermore, a density of 40 dwellings per hectare would clearly be excessive in relation to the average density of surrounding properties.

Having already lost a school in the Greenway it would seem prudent to retain this particular building as an educational facility even if it is no longer required by Amersham and Wycombe College as a Campus.

Even if new dwellings were to be constructed on the footprint of the existing building, Green Belt Protection is afforded to the existing playing fields. Any development on the site would, therefore, need to have a Section 106 requirement imposed upon it to guarantee access to the playing fields, create an appropriate car park for the facility, and provide a sports pavilion and/or changing rooms.

The Section 106 requirement could also include the construction of a roundabout at the junction with Lycrome Road and Nashleigh Hill in order to facilitate the additional traffic volumes which any change in use will bring.

Residents are expressing concern as to the impact the development would have on the increase in vehicle movement per day on Nashleigh Hill, thus bringing additional traffic congestion into the town centre. Furthermore, if hard standing for vehicles is to be accommodated on land which is currently covered by grass then this in itself will give an additional run off problem and potentially increase the risk of flooding into The Vale.

10. IDENTIFYING SITES WHERE ADDITIONAL PROPERTIES COULD BE LOCATED

One resident has suggested that the industrial site known as the Saxeway Business Centre in Chartridge Lane should be turned over to residential use. It is situated outside of the town centre in a setting of Outstanding Natural Beauty and would make an ideal location for a Care Home or Sheltered Housing. This site is not included in the SHLAA.

11. IDENTIFYING EMPTY PROPERTY AND BRINGING IT INTO USE

Part of the Core Strategy should be to identify empty properties within the District which could be refurbished for sale or for use as social housing.

Part of the Core Strategy should, therefore, be to ensure that the character of the area as a whole is retained, ensure that any new properties are within a sustainable framework, and that properties which are already in existence are put to best use.

12. STRATEGIC POINTS AND CONCLUDING REMARKS

STRATEGIC POINT 1

The core plan does not adequately prioritise the access to affordable housing for people who are already living, working or homeless in the Chiltern District area as opposed to simply providing resources to absorb overflows from other areas. Adding this priority would improve the probability of success in achieving the strategic objectives of reducing commuting, congestion and pollution. This mainly affects the following parts of the Core Plan, with other consequent minor knock on effects in other areas of the document:

- Section 4.3 Sustainable community
- Section 8 Developing and living sustainably
- Section 16 Providing affordable homes
- Section 19 Looking after the environment
- Section 20 Accessibility and transport

STRATEGIC POINT 2

There has been considerable loss of health based amenity in the area that the core plan does not address. In particular, access to Accident and Emergency services and NHS dental services in the Chiltern District area are inadequate. This can only deteriorate with the expected increase in population arising from the additional housing in the Core Plan. In addition, the use of the Hospital Hill site should comply with the restrictions placed on the bequest of the location to the town and make use of the pre-existing planning permission on the site for a clinic. In addition to improving the probability of success in achieving the strategic objectives of reducing travel, congestion and pollution (as at 1 above) this point also supports the objectives of sustainability, health in the society and no loss of community facilities. In addition to the parts of the core plan mentioned in 1 above, this point also affects the following areas of the document:

- Section 6.1 A healthy society
- Section 6.2 (Especially VIII) No loss of community facilities unless replaced
- Section 7.17 Non-residential development

CONCLUSION

This report has been drawn up to reflect the views of numerous Chesham residents who have taken the time and trouble to produce material which has been consolidated into this report.

The comments made are a direct reflection of the concern within the town relating to excessive inappropriate development, whilst recognising that we are required to accept a specific amount of appropriate development within the District as a whole.