



## LOCAL PLAN QUESTIONNAIRE - IN PLAIN ENGLISH

### **INTRODUCTION**

The government have recognised that there needs to be a massive nationwide house building programme. They have required all local authorities to estimate how many new homes will be required in their area and to identify where they may be built.

Residents are asked to consider the plan process and contribute their comments and suggestions to make it not only workable but also acceptable to the community.

### **HOUSING AND ECONOMIC DEVELOPMENT NEEDS ASSESSMENT (HEDNA)**

HEDNA has calculated a need in Chiltern District/South Bucks area for 15,100 dwellings and 15 hectares of employment land to be found from 2014 – 2036. It also identifies affordable housing need and other specialist needs including for older people.

Both councils are aware that they may in addition be asked to accommodate overspill from London.

The draft HEDNA has identified a need for:

Needs		Chiltern	South Bucks	Joint total
Housing (no.s)	General	7,300	7,800	15,100
	Affordable (inc in General above)	1,100 to 2,000	1,600 to 2,200	2,700 to 4,200
Economic		+2 hectares	+ 13 hectares	+15

In addition a needs assessment has been undertaken for Gypsy, Traveller and Travelling show people accommodation. Current identified needs are for 42 pitches for travellers and 16 plots for travelling show people from 2013 to 2023.

For “best fit” it has been decided to create a plan that covers Chiltern, South Bucks, Wycombe and Aylesbury Vale.

The draft policy is that instead of trying to allocate so many extra dwellings per individual settlement, they will look at the area as a whole.

A Duty to Co-operate means that in areas where there is not much land available for building, some of the shortfall may be taken up by building in a different area instead – for example extending Aylesbury instead of building in Chalfonts. There is also a Duty to Co-operate with neighbouring areas of Slough, Windsor and Maidenhead, Hillingdon, and the Mayor of London.

Some dates are retrospective because part of the need has already been met.

### **QUESTION 1.**

**Do you have any comment on the way that the plan areas have been defined, or the idea of working together to spread the load across the whole area?**



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### **HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT (HELAA)**

HELAA estimates the supply of development land in the plan period from sites within existing built-up areas and on previously developed land in the Green Belt.

In Bucks the supply of land for building will be reviewed annually.

A draft assessment has been prepared to identify potential development areas within the existing built-up areas and on previously developed Green Belt land. It is not complete and work is still in progress. An overview of plots already identified in our area is here [http://www.chalfontstgiles-pc.gov.uk/userfiles/files/HELLA\\_Overview%20for%20CSG.pdf](http://www.chalfontstgiles-pc.gov.uk/userfiles/files/HELLA_Overview%20for%20CSG.pdf)

In short, the following areas of Green Belt in Chalfont St Giles Parish are currently vulnerable:

**Chalfont Grove, Narcot Lane**

**Cherry Tree Lane, Puers Lane, Jordans**

**Blizzards Yard Car Park, off High Street**

**At this stage the following sources of land have not been included, but will be considered as part of subsequent reviews:**

- a) Open space within developments that may be surplus, or where things like play parks might be re-located elsewhere to release space.
- b) Development options within Green Belt

The Councils are also undertaking a Green Belt assessment. Part 1 evidence is now published - see <http://www.chalfontstgiles-pc.gov.uk/news.php?template=2&id=424> , Part 2 due to start. Outcome from Part 2 will be used to inform subsequent HELAAs

What they are saying above is that the issue of redefining Green Belt, and therefore the issue of building on **Upper Stone Meadow**, is not currently being considered because it is not contained within the current HELAA. After the review is complete, there will be a further consultation and the question may be asked then.

### **QUESTION 2.**

**Do you have any comments on the draft HELAA, particularly in relation to whether included sites are likely to be deliverable by 2036 and whether additional sites should be added?**

### **QUESTION 3.**

**Are there existing uses/sites not currently identified in the HELAA and within the built-up areas that may be surplus to requirements or where the existing use could be consolidated or re-provided elsewhere such as open spaces, sports and leisure uses?**



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In comparing development needs (draft Buckinghamshire HEDNA) against potential development supply (draft HELAA) it is clear that there will be a significant gap for unmet development needs in the plan area unless further site options can be identified or new development opportunities can be provided within the Green Belt.

This position needs to inform the Plans, Vision, Objectives and Spatial Strategy options set out below for consultation views

### **Broad Findings from the earlier Chiltern District Local Plan and separate South Bucks District Local Plan Regulation 18 consultations : PLAN, VISION AND OBJECTIVES**

#### **Chiltern:**

The Core Strategy and Delivery DPD Employment and Shopping objectives were suggested as a starting point and it would appear that these are generally supported.

Requested additional measures were for the protection of the Green Belt and AONB, improved design, enhancement of local character, better environmental measures, and HS2 (impact and opposition).

Green Belt protection will need to be considered in the context of development needs and the Green Belt Assessment while HS2 is not a local plan matter and all other suggestions mentioned are supported.

In addition the consultation highlighted support for a restructuring of Chesham employment base through identifying new employment space on the edge of the town in the Green Belt to encourage new investment, meet the needs of existing local businesses and support new local business start-ups and release of some outdated, poorly located employment space for housing/other uses.

The Vision for **South Bucks** is similar, but includes provision for better broadband and sustainable urban drainage systems. They also mention HGV issues, the impact of HS2 and Crossrail, and the possibility of a new motorway service area in Green Belt off M25 between M40 and M4.

It is therefore likely that the new joint plan will draw on existing core strategy visions and past local plan work broadly supported in earlier consultations but also updated to take account of changed national planning policy and guidance, earlier supported consultation points and to reflect the emerging joint local plan evidence base.

#### **QUESTION 4.**

**Do you agree with the approach to the Joint Local Plan Vision and Objectives and if not what changes or additions do you consider are needed?**

**Please explain your reasoning for suggesting any alterations**



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### **SPACIAL STRATEGY OPTIONS – or, how to go about fitting more houses and employment opportunities into our area**

An earlier consultation sought views on the following suggestions:

#### **Chiltern:**

- a) Making more efficient use of land within built-up areas
- b) Extensions to main settlements (Chesham, Amersham, Little Chalfont and Chalfont St Peter)
- c) Extensions to a wider range of settlements (also Great Missenden, Prestwood and Chalfont St Giles)
- d) Village extensions
- e) Potential expansion of nearby settlements outside the District through the Duty to Co-operate
- f) A new settlement in or near to the District

In the previous consultation option a) was the most popular – 56%.

22% supported option b), **and 19% supported option c)**

**These options were mainly supported by landowners and developers 50% supporting option b) and 64% supporting c)**

Generally residents do not wish to see Green Belt releases in their area but may support urban extensions to other settlements, but with significant numbers apparently accepting that some Green Belt loss may be required.

There was limited support for option d) (only 7% of all respondents), mainly where developers were promoting specific sites for development.

For option f), 3 respondents (including Aylesbury Vale District Council) suggested that a new settlement (either within or outside of Chiltern) could be considered as an alternative option.

12% of residents supported a combination of options a) to d).

For option e), 8% of respondents stated that the Council should look to neighbouring authorities to take on Chiltern's development needs as part of the Duty to Co-operate while 7% of respondents suggested that the Council should not allow any further development in the District, (this option cannot be considered)

The Councils need to find more space for the housing required and want to re-visit views on the above list about where development should take place. They need to take into account environmental constraints and infrastructure needs.

They also need to explore ways to protect and enhance the quality of life in Chiltern and South Bucks (e.g. planning for community, recreational and cultural needs, enhancing the Chilterns AONB, improving our townscapes, respecting and protecting our historic environment, enhancing a local sense of 'place', etc.) through new development proposals and policies.



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Given the overall levels of need and limited scope for development to meet that need the councils consider that there are exceptional circumstances to review the Green Belt.

Because of that, the Councils want to hear your views on the following **Options**:

- a) Making more efficient and effective use of land within existing built-up areas such as putting buildings closer together or making them taller, re-locating play parks etc to Green Belt to make more space available within the urban environment, or using some employment land for residential.
- b) Consider increasing development opportunities by reviewing the purpose and function of existing areas of special control – such as Established Residential Areas of Special Character (Chiltern Saved Local Plan), Conservation Areas
- c) Extending the principal settlements of Chesham, Amersham, Little Chalfont , Beaconsfield, Chalfont St Peter, Gerrards Cross and Burnham.  
**Preliminary work has identified strategic options for further testing and consideration as part of the next stage of the Local Plan (see Appendix 2 of the Plan Document)**
- d) Extending settlements outside the Plan area – Wycombe, Uxbridge, Slough, Maidenhead  
**Preliminary work has identified strategic options for further testing and consideration as part of the next stage of the Local Plan (see Appendix 3 of the Plan Document)**
- e) Extending a wider range of settlements – Great Missenden, Prestwood, **Chalfont St Giles**, Iver Heath, Farnham Royal, Stoke Poges, Iver Village  
**Preliminary work has identified strategic options for further testing and consideration as part of the next stage of the Local Plan (see Appendix 4 of the plan document – which includes the plan that has been used on the Save St.Giles website)**
- f) A review of settlements within the Green Belt with a view to removing larger settlements currently within the Green Belt and to explore development potential – e.g. Botley, Nashleigh Hill/Lycrome Road area Chesham, South Heath, Hyde Heath, Little Kingshill, Winchmore Hill, **Jordans**, Denham and Taplow
- g) A detailed review of the inner Green Belt boundaries to address any existing anomalies, areas of significant development such as the Epilepsy Centre, Chalfont St Peter and/or small scale releases which would meet the test of exceptional circumstance to undertake a change, not undermine a purpose of the Green Belt and be capable of establishing a durable and defensible new boundary
- h) Review the scope for allowing limited infilling within villages and generally built up frontages within the Green Belt – **ie potentially joining up Chalfont St Giles and Chalfont St Peter or Little Chalfont**
- i) Extension(s) to other settlements such as the larger villages



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- j) In addition to options included above, additional sustainable growth options in built up areas and/or in the Green Belt close to train stations – Chesham, Great Missenden, Amersham, **Little Chalfont, Seer Green, Iver and Taplow. Obviously any growth in population concentrated on train stations will have implications for parking and other infrastructure.**
- k) Meeting office, warehousing and employment needs:
- i. Try to make existing employment areas in built-up areas bigger
  - ii. Consider using the Green Belt options referred to under C, D, and E above for employment – ie edge of town industrial parks
  - iii. Taking some existing employment areas out of Green Belt eg Chalfont Park, Chalfont St Peter, Court Lane, Iver and Pinewood Studios, Iver Heath
  - iv. Consider increasing employment opportunities at existing sites within Green Belt, eg Pollards Wood Little Chalfont and **Chalfont Grove Chalfont St Giles**
  - v. Try to find new areas in Green Belt that would be suitable for employment and would offer local employment opportunities.  
**Suggested areas of Search have been identified for testing, and are contained in Appendix 5 of the Plan Document**
  - vi. Consider the best opportunities for securing inward investment (e.g. redevelopment of existing employment land or allocating new land at and near Iver for accommodating possible displaced employment uses should Heathrow Airport expansion proceed) and opportunities within the plan area for supporting and growing indigenous start up and small/medium employment uses.
- l) A combination of all or a number of the above

Appendices 2 to 5 of the Plan Document identify proposed Green Belt options for growth to be tested in the next stage of the Local Plan. Appendix 6 identifies all of these options in a single map of the plan area to show their distribution and relationship to each other

### QUESTION 5.

**Which of these options do you think the Councils should consider? Please put them in order of acceptability. Can you think of any others? If yes, why?**

### QUESTION 6.

**Do you have any comments on the above options generally, or on specific settlements/site options that could be part of these options?**



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### OPTIONS FOR MEETING DEVELOPMENT NEEDS OUTSIDE OF THE JOINT LOCAL PLAN AREA

It seems likely that even after this major review, it maybe that some needs may be impossible to meet within our area. We need to be realistic and understand that the areas around us will also have similar difficulties. That why the Councils will see to maximise the opportunities offered by the Duty to Co-operate which may mean that other areas can take some of the burden.

### QUESTION 7.

**Do you have comments on the suggested level of unmet needs in Chiltern/South Bucks?**

### GREEN BELT ASSESSMENT

In order to squeeze in more houses and employment opportunities, the Buckinghamshire authorities are undertaking a review of the Green Belt. Part 1 has established a way of doing it, determined whether any parts of the Green Belt no longer fulfil their Green Belt purpose and can therefore be removed, and has worked on identifying options for Green Belt release – ie which areas of the Green Belt would have the least damaging effect if they were removed from the Green Belt if exceptional circumstances for their removal could be demonstrated.

Appendices 2 to 6 are the result of this review, including the area known as **Upper Stone Meadow, Chalfont St Giles**. They will be subject to testing to see if they could be removed from Green Belt without too much damage, should exceptional circumstances dictate that it was necessary.

**Importantly a significant part of the Joint Local Plan Green Belt is within the Chilterns Area of Outstanding Natural Beauty (AONB) and/or has other constraints such as having important heritage, biodiversity or open space value which has not been assessed in Part 1 of the Green Belt Assessment for development potential. Therefore although land may be identified as an option for removal from the Green Belt at this stage this does not mean that if removed it will necessarily be appropriate for development or development potential may be limited.**

**Where land is to be proposed to be removed from the Green Belt, the Joint Local Plan will also consider whether additional planning controls are appropriate such as protection as local green space or consideration for other controls outside of the local plan like conservation area designation. A good example of this could be Burnham Park which is considered to not have any Green Belt purpose and so should be removed from the Green Belt but fulfils an important open space recreational use, is important to place shaping and local character and as such could be considered for identification as a local green space.**

Question 13 ask us to nominate areas to be designated as a local green space



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### **AFFORDABLE HOUSING**

The draft HEDNA to 2036 identifies a need for between 2,700 and 4,200 affordable homes (housing that cannot be accessed by households without housing benefit support) which is part of the overall housing need of 15,100 dwellings. The Councils will need to consider what proportion of the new homes that are built should be affordable housing.

### **QUESTION 8**

#### **Do you have any comments or suggestions on how the councils can meet their local affordable housing need?**

You may wish to comment on whether we need another block similar to the flats near the church, or whether private houses that come up for sale should go to Housing Association stock, or whether housing Associations should be prevented from selling off their housing stock etc

### **SPECIALIST HOUSING NEEDS**

#### **Gypsy, Traveller and Travelling Show people site options**

Options for meeting the needs of travellers are considered to be:

- a) Protect existing lawful sites solely for use by travellers, travellers being defined by national policy
- b) Infilling where appropriate within existing lawful traveller sites, subject to the sites being appropriate to be removed from the Green Belt
- c) Proposed extension of The Orchards, Chalfont St Peter as supported in the emerging Chalfont St Peter Neighbourhood Plan
- d) New pitches/plots to be required as part of residential extensions to built-up areas comprising 100 or more dwellings**
- e) Consideration of nominations under the Call for Sites and any subsequent nominations
- f) Unless sufficient pitches/plots can be provided from the above sources, existing pitches/plots with temporary planning permission will be considered and
- g) Consider phasing of development sites particularly where supply exceeds need to protect future local needs options

### **QUESTION 9**



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**Do you have any comments on the above options to meet the needs of Gypsies, Travellers and Travelling Show people?**

For example you may wish to comment particularly on the suitability of the suggestion in d) above

### **Older Peoples Accommodation**

The draft HEDNA identifies a further need for specialist accommodation for older people requiring care. In order to meet such need there may be a requirement for larger housing developments to include an element of specialist elderly care accommodation as well as encouraging provision in other appropriate locations.

Through the Duty to Co-operate the councils have been requested by the Chiltern Clinical Commissioning Group to explore the scope for requiring a proportion of elderly care homes to be provided as affordable units. Presumably this means affordable housing for the elderly.

### **QUESTION 10**

**How do you think the Joint Local Plan can best meet specialist elderly accommodation needs, both in term of general and affordable needs?**

Do you think that Chalfont St Giles needs more homes for the elderly? If so, should it be as individual houses, or as another small development such as that behind the library, or do you think that there is more of a need for a sheltered housing/care home facility?

### **PLANNED WORK AS PART OF THE NEXT STAGE OF THE JOINT LOCAL PLAN**

As part of the next stage of the Joint Local Plan and once the planned level of development has been established the councils will undertake additional evidence base work, such as to establish retail, town centre, leisure, open space and community facility needs. The councils will also undertake other work such as a review of the \*settlement hierarchy, town, district and local centres, identify existing employment areas to be protected and establish infrastructure needs.

\*Settlement hierarchy = A settlement hierarchy groups a number of settlements according to their size and shape. As you move up the hierarchy the size of the settlement increases and the number of them decreases. There are more cities than conurbations, more towns than cities, and more villages than towns.



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### Heritage

The Councils do not currently have a Heritage Strategy and have to date been seeking to protect heritage assets using mainly its planning powers where necessary. The Councils accept that heritage assets are an irreplaceable resource. By setting out a strategy the Councils will be able to better inform their Plan-making and decision-taking, to engage with key stakeholders and the general public, identify related projects, and show how the Councils regard the importance of heritage assets in defining Chiltern and South Bucks and their respective settlements as a 'Place' and contributing to community identity.

The aim of this Strategy is to clearly describe the heritage assets of the Chiltern and South Bucks Districts. To outline the importance of these heritage assets to the Districts' character and identity and to show how the Councils will aim to conserve and enhance its heritage assets whether currently identified or discovered in the future.

### **Question 11**

**Do you have a view on the Heritage Strategy – for example views on our local heritage assets, how heritage contributes to quality of life and our sense of place and community?**

This question asks how important you think our heritage is to you and to the community and the general feel of the village. If you are aware of any archaeological finds for example, or any specific places with history that help to make Chalfont St Giles a special place you could comment on them here.

The Heritage Strategy review will also be an opportunity for the local community to identify a list of local heritage assets which are not already protected (i.e. not listed buildings or scheduled ancient monuments) with the view to protecting these from inappropriate development and/or enhancement as part of development proposals. Local heritage assets need not be limited to buildings but could for example include historic structures, street furniture, managed landscapes or landscape features. They could also include important or landmark buildings within conservation areas or buildings of special local character or historic significance.

### **QUESTION 12**

**Are you aware of any currently unprotected local heritage assets that should be identified and if so why is the heritage asset important locally?**



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Fill your boots on this one! Can you think of any heritage assets (historical buildings or items) that help to define the character of the village and should be protected? You might think of the ford at Mill Lane, or the pump on the village green, or the pond, or any number of buildings.

For information there is a list of listed buildings within the conservation area on the Parish Council website <http://www.chalfontstgiles-pc.gov.uk/userfiles/files/Listed%20buildings%20in%20conservation%20area%20CSG.pdf> but there's no harm in listing them again here

### **LOCAL GREEN SPACE DESIGNATIONS**

Local communities are able to nominate green areas of particular importance to them for consideration for special protection through the Joint Local Plan and/or neighbourhood plan. Local Green Spaces would need to be considered against national policy and guidance. If designated as a Local Green Space, development would only be allowed in very special circumstances.

National Policy and Guidance is available here <http://planningguidance.communities.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

It includes the following:



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- a) Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities.
- b) Local Green Space designation is for use in Local Plans or Neighbourhood Plans. These plans can identify on a map ('designate') green areas for special protection. Anyone who wants an area to be designated as Local Green Space should contact the local planning authority about the contents of its local plan or get involved in neighbourhood planning.
- c) Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.
- d) Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.
- e) The guidance also says that if an area is already protected by Green Belt or AONB, then consideration needs to be given as to whether any additional protection is required.

### **Question 13**

**Local Green Space designations can be made as part of the Local Plan and so local residents, community groups and other local stakeholders are asked to identify areas that they would like to be considered. Importantly any nomination should include supporting evidence.**

This is the place where all residents who are concerned about Upper Stone Meadow, or indeed Stone Meadow, or any other green space in the village that is important to them should ask for them to be designated as Local Green Space. However please note the requirement to include supporting evidence.

Paragraph 77 of the National Planning Policy Framework says this:

The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

These are the kind of comments that clearly need to be included in your answer to this question.



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Another helpful buzzword is “Green Infrastructure” which is defined in the National Planning Policy Framework as follows:

Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls.

<http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/green-infrastructure/>

It can therefore be argued that the River Misbourne Valley from Chalfont St Peter to Amersham is a strategic green infrastructure.

### LOCAL MEASURES

The councils are keen to assist local communities to help identify appropriate local measures to reflect the characteristics and needs of particular areas and to assist neighbourhoods to influence change in their local areas.

Local measures are about locally agreed plans and policies that are designed to protect and enhance the area.

### QUESTION 14

#### **Do you have any nominations for Local Measures?**

In Chalfont St Giles we started work on a **Neighbourhood Plan** and many people filled out a consultation questionnaire registering their views about local issues. Unfortunately work stalled on the completion of the plan due to a 75% change in the Parish Council last year, and other complex, time consuming and urgent work that had to be a priority. It is hoped that the Neighbourhood Plan can be completed so it is relevant to mention it here.

You should also mention your support for **the Parish Plan (The Market Town Health Check Action Plan 2008 and the Vision for Chalfont St Giles)**. These are policies that were



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completed by the Revitalisation Group and have already been adopted by Chiltern District Council on page 21 para 5.11 of the Core Strategy adopted in November 2011

### **DEVELOPMENT MANAGEMENT POLICIES**

The National Planning Policy Framework and National Planning Policy Guidelines set out national planning policies and guidance, however there are some areas of them that may need to be made relevant to the local area, for example a policy setting out their approach to Renewable Energy .

The local plan needs to address this, and the Councils will be working on Development Management Policies to be included in the Local Plan. Their intentions so far are included in Appendix 7 of the Local Plan Document. <http://www.chiltern.gov.uk/CHttpHandler.ashx?id=7771&p=0>

#### **Question 15.**

#### **Do you have a view on the scope of policies proposed in Appendix 7?**

The Parish Council have been advised to answer this question by saying that we “reserve the right to comment on the precise wording of the policies in due course”

### **INFRASTRUCTURE DELIVERY**

The councils are undertaking a Settlement Infrastructure Capacity Study. This study will be used to inform on a baseline position for key infrastructure needs such as roads, schools, health and utilities. Importantly it can also be used in relation to **Green Infrastructure** – see comments under Local Green Space.

The Parish Council are advised that

“It is clear in respect of Chalfont St Giles that the evidence base points to significant constraints in being able to deliver any quantity of development at the Village.”

#### **QUESTION 16**

#### **Do you have any comments on the Settlement Infrastructure Capacity Study, Infrastructure needs or issues and CIL?**

The CIL is a Community Infrastructure Levy. It's a means by which developers can be made to pay towards the construction of infrastructure such as drainage.



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This is the place to mention all of the significant constraints in being able to deliver any large development in the village. The obvious place to mention is Upper Stone Meadow, where development will be constrained by Flood Plain, HS2 Safeguarded area, Green Infrastructure etc

You may also want to mention the poor mobile and internet signals in the area, slow broadband speeds, your desire to maintain open countryside around the village, the need for separation of distinct communities one from another, and how a large scale development would impact on the way the area functions.

### QUESTION 17

**Do you have any other points you would like the councils to take into account in the preparation of the Joint Local Plan? For example are there any challenges or opportunities you think the new Joint Local Plan will need to address?**

If you can think of anything not previously covered, put it here. In particular you may wish to comment on the impact that the HS2 Vent Shaft site in Bottom House Farm Lane will have on the village in terms of additional HGV traffic along the A413. If the plans for HS2 receive Royal Assent then work is due to start in 2017 and construction work locally will continue for around 10 years. This is bound to impact on the required delivery of new developments under the Local Plan within the timescale to 2036.