



Pre-Submission Regulation 14: Draft Gerrards Cross Parish Neighbourhood Plan 2017-2040

Objections by Richborough

1. These objections to the Pre-Submission Regulation 14: Draft Gerrards Cross Parish Neighbourhood Plan 2017-2040 have been submitted on behalf of Richborough and also include some general comments on the policies.
2. For the avoidance of doubt, Richborough is not seeking to promote through this Neighbourhood Plan its land interest within the Parish which is more appropriately considered via the forthcoming Buckinghamshire Local Plan. This approach by Richborough recognises that the Neighbourhood Plan does not have a strategic context in an adopted Local Plan to amend Green Belt boundaries.

Draft Policy 14

3. However, notwithstanding the lack of a strategic context, it is both unclear and uncertain why in Draft Policy 14(b) there is reference to "*Outside the settlement boundary within the Safeguarded Land...*". There is no specific reference in the extant development plan nor this draft Neighbourhood Plan to the Green Belt boundary having been redrawn to enable the identification of Safeguarded Land. Accordingly, and as a formal **objection** from Richborough, Draft Policy 14(b) should be deleted.

Draft Policy 18

4. The National Planning Policy Framework (NPPF) includes national policies on Green Belts, including their purposes. One of these Green Belt purposes is "*to prevent neighbouring towns merging into one another*" (paragraph 138(b)). Draft Policy 18 seeks to define Strategic Gaps which are all within the Green Belt with their purposes stated at criterion (b), namely "*Development proposals within the Strategic Gaps that will lead to the visual coalescence or will damage the distinctive integrity of the adjoining settlements will not be supported.*". As such, there is no obvious benefits from including Settlement Gaps in the Neighbourhood Plan as identified by Draft Policy 18 because it just duplicates national Green Belt policy and is, therefore, **objected** to as being unnecessary.



5. There is also an **objection** to the proposed Gerrards Cross to Chalfont St Peter Strategic Gap. Firstly, the land identified to be included in the Strategic Gap does not actually fulfil the purpose stated. The land just encompasses a field plus some residential properties rather than actually protecting land between Gerrards Cross and Chalfont St Peter in the manner described in Draft Policy 18(b). Second, by reference to the potential for housing to be erected north of Raylands Mead and west of Bull Lane there is tacit acceptance that some development within this locality (Appendix C, Site GX5).
6. Richborough is supportive of site GX5 (as identified in Appendix C) as a potential allocation for housing development albeit the land being promoted through the Buckinghamshire Local Plan includes more land to the west of this site.

Draft Policy 4

7. Paragraph 9.6.6 refers to "*Despite recent attempts by the Town Council, no more commuter parking has been forthcoming.*" This is in response to the concerns of the community about local roads being used for commuter parking by people travelling from the railway station.
8. It is counter intuitive to Richborough that Draft Policy 4 proposes to allocate the existing railway station related parking at Orchehill Rise Car Park for 7 dwellings. The development of this proposed allocation would reduce commuter parking in Gerrards Cross at a location which is readily accessible on foot to the railway station. The loss of about 129 car parking spaces would exacerbate on-street commuter parking within the surrounding area. For this reason, Richborough objects to Draft Policy 4.
9. Concern is also expressed by Richborough about whether the site is available for development given its current parking and whether 7 dwellings could be erected because of the limited width of the site. These matters add weight to the objection. If the site does come forward for development then, as Previously Developed Land, it would be the subject of other policies in the Draft Neighbourhood Plan. Therefore, as an **objection**, the Draft Policy 4 housing allocation should be deleted.
10. If Draft Policy 4 is to be retained then the public footpath adjacent to the northern boundary should be improved to reflect the aspirations of Draft Policy 13. There would be



the opportunity to increase the width of the public right of way for pedestrians and enable the construction of a parallel cycleway. This upgraded facility should then be properly lit which is feasible given the existing car park has high level lighting. Richborough formally **objects** to the omission of a criterion to facilitate the enhancement of the existing public right of way if the policy is retained in the Neighbourhood Plan.

Draft Policy 6

11. Richborough recognise that the development plan can guide the mix of dwelling types. However, Draft Policy 6(b) is excessive in its requirements concerning one/two bedroom dwellings not normally being provided through flats or apartments. The reality of any residential development is that one-bedroom houses are not delivered because such properties cost significantly more to construct and attract a higher sales price. Accordingly, one bedroom dwellings are provided in the form of flats/apartments. Similar considerations apply to two bedroom houses but such accommodation could be provided in the form of some houses.
12. For both one and two bedroom properties which would be for affordable housing purposes then the view of the Registered Provider are also an important voice about the type of homes provided.
13. An **objection** to Draft Policy 6(b) is made by Richborough and it would be more appropriate for this criterion to refer to *"about 50% of the two bedroom properties to be in the form of houses where physical site considerations, viability and Registered Providers allow this to occur"*.

Draft Policy 8

14. **Objection** is made by Richborough to Draft Policy 8. This policy could be simplified to refer to making as much use as possible of brownfield land and to prioritise the use of such land within the urban area. This approach would be consistent with NPPF paragraph 119.



Draft Policy 10

15. Richborough **objects** to Draft Policy 10(b) which exceeds the requirements of NPPF paragraph 110(d). A mitigation scheme should only be required to avoid significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety.

Draft Policy 13

16. The principle of Draft Policy 13 is supported but the Walkway Routes shown on the map at Appendix H are incomplete. It is noted that the Walkway Routes extend into the neighbouring Parish of Chalfont St Peters and, on this basis, the existing public right of way Orchehill car park and Bull Lane should be shown as other routes outside the Neighbourhood Plan area are. The inclusion of the full length of this Walkway Route would achieve the intention of enabling access to the Green Belt and wider countryside identified at paragraph 9.3.1 of the Draft Neighbourhood Plan. On this basis Richborough **objects** to Draft Policy 13.

Draft Policy 16

17. The term "*exceptional circumstances*" referred to in Draft Policy 16(b) is inappropriate and should be deleted. On this basis Richborough **objects** to Draft Policy 16.
18. Unless the natural features are the subject of statutory protection then they do not have an elevated status in the determination of applications. There are material considerations which need to be assessed alongside the benefits of the proposal.

Draft Policy 17

19. Other than reference to particular designated heritage assets, there is a need for Draft Policy 17 to be redrafted to reflect the heritage policies of the NPPF. On this basis Richborough **objects** to Draft Policy 17.



General Comments

20. Although there is no updated strategic planning policy context and the Neighbourhood Plan extends up-to 2040, Richborough is supportive of the comments at page 8 that the plan will be updated and amended. This commitment reflects the potential for housing to be allocated, whether the identification of specific sites or as a housing requirement figure for Gerrards Cross (and potentially Chalfont St Peters), in the Buckinghamshire Local Plan.

Date: 7 August 2023