

Brown Not Green

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Councillor M Tett
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cc: Ian Kemp, Programme Officer, The Planning Inspectorate

23 January 2020

Dear Councillors Darby, Naylor and Tett,

This is an open letter (copies will be sent to local media and posted on social media), from the undersigned, concerning the draft Chiltern & South Bucks Local Plan (“the Plan”).

The Plan, which is intended to set out how Chiltern and South Bucks will develop over the period until 2036, has been in the making for over five years and on 26 September 2019 was submitted to the Secretary of State for an independent examination to be conducted under Section 20 of the Planning and Compulsory Purchase Act 2004. This followed a public consultation under Regulation 19 between 7 June and 23 August 2019 which generated over 6,300 comments. This means that the current (publication) version of the Plan dates from May 2019.

While some changes in the context to the Plan might be expected over time, there has been a very radical change in circumstances since May 2019, which we believe means the Plan in its current form is no longer appropriate. Since May:

1. The Chiltern and South Bucks Councils, who have owned and produced this Plan up until now, will be abolished on 31st March 2020 (ie: in just 2 months time)
2. The new Shadow Unitary Authority has stated that it intends to have a new Local Plan covering the whole of Buckinghamshire in place by April 2025¹
3. But perhaps most importantly, there has been a sea change in views on the future of our planet, which is reflected in recent campaigns, guidance, regulations, policies and legislation at international, national and local levels:
 - a. A new realisation that Climate Change needs drastic action has evolved across the globe in 2019².
 - b. The UK Government announced the Environment Bill on 14 October – and has stated it will progress the Bill early in the new Parliament following the General Election. As a result, environmental principles will be enshrined in

¹ “PINS_covering_letter_for_submission_26.09.19_FINAL.pdf”

² The Intergovernmental Panel on Climate Change (IPCC) called for an immediate reduction in carbon emissions by 45% from 2010 levels by 2030, with the aim of reaching 'net-zero' by 2050. The UK declared a Climate Emergency in May, followed by the EU declaring a Climate Emergency in November.

law and measures will be introduced to improve air and water quality, tackle plastic pollution and restore habitats so plants and wildlife can thrive.

- c. The NPPF has been updated twice, most recently in February 2019, and now has improved protection for green belts compared with the criteria that applied when the Council carried out its Green Belt Preferred Options Consultation back in 2016.
- d. The Glover Review has reported and recommended National Park status for the Chilterns, potentially significantly changing the planning process that applies to the AONB.
- e. The Chilterns Conservation Board has published a new Management Plan for the period 2019-2024.
- f. The Colne & Crane Valleys' Green Infrastructure Strategy was published in September.
- g. On 23rd July, Chiltern and South Bucks District Councils declared a Climate Emergency and set out a number of specific actions it intended to take.

Taken together, we are convinced that these events have made the draft Local Plan out of date before it even reaches the public inspection. Most importantly, the Plan is inconsistent with the Council's own statement on Climate Emergency, where it said it would:

1. *use all practical means to reduce any negative impact of Council services on the environment, with an aspiration to be carbon neutral by 2030;*
2. *ask officers to ensure that specific consideration is given to how policies and our related decisions and actions, affect our contribution to climate change, and take action as appropriate;*
3. *continue to work with partners (including local residents and businesses) inside and outside the community to deliver widespread carbon reductions.*

The Plan does not achieve any of this. On the contrary, according to the Councils' own Sustainability Appraisal (SA), the Plan is taking us completely in the wrong direction, even after mitigations in the proposed policies are taken into account. As the SA says, there will be (amongst many other impacts):

- a reduction in local air quality
- a probable increase in fluvial flood risk
- increased emissions of greenhouse gases – with an increase in the Plan area's carbon footprint by 21% or more
- and there is a critical lack of water in the aquifer for both the Chess and Misbourne chalk streams that has not been addressed in the Plan.

Clearly this is not compatible with the IPCC target of "an immediate reduction in carbon emissions by 45% from 2010 levels by 2030" that the Council has signed up to.

In the circumstances, we believe that pursuing the current path of proceeding to a public inspection of the current Plan is not the best way forward. The impact of the new realisation of climate change is such that a radical, and therefore completely new, approach is needed. Tweaking the current Plan will not do it.

It is also worth noting that the inspection is not likely to start until the District Council is abolished (or will be while the inspection is in progress), leaving the new Unitary Authority

to defend a Plan that it did not produce and which, as we have pointed out, was produced before realisation of Climate Change moved the goal posts. It will also inevitably waste a huge amount of public money – not to mention the time and costs that would be incurred by our organisations in preparing for, and attending, the public inspection. We feel these limited resources could be better used to work towards a new Unitary Plan. Even the current Plan, if it were to make it through the inspection, would probably not be adopted until at least late 2021 (based on experience with Wycombe and Aylesbury Vale). By that time a new Unitary Plan could be emerging. It seems pointless to continue with a Plan that is so incompatible with the new circumstances and which will only exist for a very short time.

So we would urge the Councils to withdraw the current plan and apply the saved resources to start work now on a new Unitary Plan that recognises the changed world in which we now live in. You would not be the first Council to do thisⁱ.

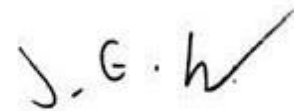
Yours sincerely



Neil Salisbury
Trustee and Head of Planning
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Alison Wheelhouse
Chair
Beaconsfield Society



Dr J. E. Conboy
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Phillip Plato
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Anita Cranmer
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ⁱ In **Sheffield City Council**, Councillor Bob Johnson, Cabinet Member for Planning and Development, said: “We know that people have waited a long time for the Local Plan which will be so influential in guiding Sheffield’s future development and has such a key role to play in our city’s well-being and sustainability. We regret delays to the Local Plan but there is now an opportunity for Sheffield to be one of the first cities to truly respond to the rapid changes and challenges going on throughout the world. The recent declaration of the Climate Emergency, and commitment to rapid decarbonisation over the plan period, adds impetus to the need to secure sustainable sites for housing growth in the city”.

He continued: “A stronger focus on the central area would potentially support lower carbon living, providing more efficient buildings and encouraging sustainable travel” and “We are committed to protecting the city’s Green Belt wherever possible and focusing more development in the central area of the city will help us maximise the reuse of brownfield sites.” (Source: <https://sheffieldnewsroom.co.uk/news/call-for-sites-heralds-revisit-of-sheffield-local-plan-as-the-city-takes-forward-new-city-centre-vision>)

At **Amber Valley Borough Council**, the new Council Leadership stated a desire to revisit the parameters of the Local Plan, in order to reconsider the need to amend the Green Belt boundary, to delete land from the Green Belt and identify sites for new housing development. It also wishes to “ensure that the council can maximise the re-use or redevelopment of previously developed or brownfield land to meet housing need. It was resolved that the current submitted Local Plan be withdrawn to enable the Spatial Vision, Strategic Objectives and Spatial Strategy Policies to be totally reviewed for the reasons laid out at paragraphs 6.6 and 6.10 in the Officer’s report” (Cabinet Minutes, 22 May 2019). Also, at **Sevenoaks District Council**, the Inspector has urged the Council to withdraw the Local Plan from Examination because she considers the Council has not carried out its Duty to Co-operate (DtC) with neighbouring councils. Sevenoaks DC’s area is 93% green belt, much of that also AONB, so very similar to Chiltern & South Bucks, which has also not fully carried out its DtC.