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## **The Sustainability Assessment accompanies the draft Local Plan 2036**

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(if representing one,

**Please use this space to comment on the Sustainability Appraisal as a whole or on specific parts of the Appraisal**

#### **INTRODUCTION:**

- i. I offer this submission on behalf of **Brown Not Green Chesham Ltd** (hereafter referred to as BNG) which is a not for profit private company limited by guarantee that was incorporated in 2016 with the sole aim of protecting land around Chesham for the benefit of those living around Lye Green specifically and the wider community of Chesham generally.
- ii. The Company has received support from circa 1,800 local individuals and has 95 household members representing nearly 200 individuals living in Chesham. This submission is therefore very much focused on the needs of Chesham within the wider District of Chiltern & South Bucks.
- iii. Given the SA informs and supports significant decisions pertaining to the emerging Local Plan, BNG has reviewed the SA and has identified several areas of concern that will be addressed herein. These are;
  1. Carbon Footprint increase
  2. General comments on SA Methodology
  3. Water Management/pollution
  4. Biodiversity & habitats
  5. Air Quality issues

1. CARBON FOOTPRINT INCREASE:

1. 1. The most significant concern is that the SA estimates the carbon footprint of Chiltern & South Bucks Districts would increase by at least 21% (when the population is only estimated to increase by circa 11%).
1. 2. Given the Government have recently legislated for the country to produce net zero emissions by 2050, there is a very real concern as to whether a Local Plan predicated on such a basis is either sustainable, sound or legal.
1. 3. Accordingly, on 10 July 2019, BNG, made a request to Chiltern District Council under the Freedom of Information Act 2000 & the Environmental Information Regulations 2004 for details on how the carbon footprint estimate had been quantified by LEPUS CONSULTING including what modelling methodology and information was used to support the 21% increased carbon footprint that is predicted in the SA.
1. 4. After subsequently sending a reminder email to the Council on 6 August, two responses were received with attachments which are summarised in **ANNEX A** to this response that is included herewith. It seems from the information recently provided that LEPUS CONSULTING is now amending the figures whereby the increased carbon footprint is now claimed to be only 16.9%.
1. 5. Apparently, this addendum reflects the fact that their previous figures had included 5,750 homes being provide in Aylesbury under the Duty to Co-operate. However, aside from the revised carbon footprint still being an unacceptably large increase compared to the projected population figure, the figures recited in the Fol response do not seem to make sense.
1. 6. The Council's recent email recite a figure of 11,099 homes being built in the Plan Period + 5,750 homes (going to Aylesbury) but that does not add up to the 14,043 homes LEPUS CONSULTING originally used to calculate the carbon footprint increase. These two figures total 16,849 homes (ie: there appears to be 2,806 homes that have gone missing from the calculations somewhere).
1. 7. Also, the LPA emails refer to the carbon footprint figure being subject to mitigation. Where are the details of such mitigation or even evidence that the mitigation will work?
1. 8. Indeed, from the information provided and the copy emails, it is very difficult to understand how Lepus Consulting have reached the conclusions they have. For example, what justified the basis of the carbon footprint of 1,195,200 tonnes per year? This does not seem to reflect either the national figure or the figures for Chiltern and South Bucks'.
1. 9. Rather, it appears to be the basis of a very simplistic calculation derived from averages divided by the number of households, (see email of 7 August 2019). The figures themselves are not explained in sufficient detail to be understood.
1. 10. It also appears from the emails supplied that there has been no attempt to understand the carbon impacts of the development plan and this has been known by the Council from an early time, (see email of 11 June 2019), but it appears a positive decision was taken not to obtain such an evidence base.

1. 11. Accordingly, BNG feel it is necessary to understand the figures in order to establish if a climate change report is necessary. Is it appropriate or justified for the Council to suggest that it doesn't have to do a climate change report because it is "precautionary". Use of this average carbon footprint to calculate the Plan footprint is necessarily wrong because the average itself could well be wrong – i.e. how can it be known without evidence whether in fact the carbon emissions of some 9,000 - 11,000 homes would not in fact be very substantially larger as a consequence of the proposed developments in the proposed localities than these average figures?
1. 12. Has the number been derived by cherry-picking figures from the enormous underlying spreadsheet supplied by the Council or choosing those from other comparable areas (if it is on a national basis) or arguing that these figures will be reflecting some mitigation whereas the facts are that no mitigation is planned in this scheme or by undertaking some critical consideration of the situation within the plan area and the extent to which this is a car-led plan or the extent to which it is likely to be worse than national averages?
1. 13. Any approach based on averages (especially unjustified ones) is "plainly not sound". There is no doubt that the construction of houses will have a very significant impact on the environment. The precautionary principle is not to be applied in any event (let alone in the planning context) simply to avoid the collation of adequate evidence to quantify and then seek to mitigate that harm. Understanding the nature and extent of the impact requires assessment to be appropriately assessed.
1. 14. An understanding of the nature and extent of the impact as assessed in the SEA then informs the plan policies required to minimise that impact. For example; (1) a climate change report of proposed developments would enable a site-specific carbon review so that the carbon impact of particular developments can be properly assessed. This is critical when considering impacts. BNG maintains the development at Lye Green will be a car-led scheme which has a poor relationship to public transport. (2) the plan policies required to minimise impact are a function of understanding these relationships. Plan policies may seek "carbon zero" homes, or require "carbon zero" homes in certain areas, or aspire for car-free developments, etc. These can be linked to a photovoltaic (PV) system or other more sustainable infrastructure.
1. 15. The approach adopted by this Local Authority appears inconsistent with the NPPF and wider Government policy which has declared a Climate Emergency and the need to secure a net reduction over 1990 levels, not a further increase.
1. 16. One of the three key principles of sustainability is "*an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy*".

1. 17. Paragraph 148 NPPF makes clear that *"The planning system should support the transition to a low carbon future in a changing climate... It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure"*.
1. 18. This SA (and the Local Plan it supports) through not adequately reviewing and seeking to minimise its carbon emissions, entirely fails to seek to shape places in a way that contribute to radical reductions in greenhouse gas emissions.
1. 19. BNG feel that without having carried out even a basic carbon assessment of the proposals, the requirements for Strategic Environmental Assessment have not been lawfully carried out, because that requires the report to *"identify, describe and evaluate the likely significant effects on the environment of– (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme"* Likely significant effects on the environment cover short, medium and long-term effects, , permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as– – (i) biodiversity; – (ii) population; – (iii) human health; – (iv) fauna; – (v) flora; – (vi) soil; – (vii) water; – (viii) air; – (ix) climatic factors; – (x) material assets; – (xi) cultural heritage, including architectural and archaeological heritage; – (xii) landscape, and – (xiii) the inter-relationship between the issues referred to in sub paragraphs (i) to (xii).
1. 20. The approach this Local Authority appears to have adopted means that climatic factors have not been identified, described and evaluated, and alternative options within the Plan's objectives and geographical scope which may have lower carbon footprints, have not been considered or evaluated.
1. 21. The UNECE Protocol on Strategic Environmental Assessment "Applying the Protocol on SEA": *"SEA facilitates the improved consideration of environmental limits in the formulation of plans and programmes. It helps in considering alternatives and encourages the search for win-win options that open opportunities for new developments within the carrying capacity of ecosystems. SEA thus supports a shift of decision-making towards genuine sustainable development."* The focus on simply choosing a national figure means that an approach looking for win-win options has not taken place.
1. 22. Given that the revised carbon footprint figure is still so high, together with the lack of any clear explanation relating to the method of calculating the carbon footprint, and the apparent reliance upon averages and the confused recital of housing numbers that underlie the SA, BNG feel that a further review of this SA is necessary together with a detailed explanation of proposed mitigation that needs to be introduced to reduce the carbon footprint of both Districts to ensure the Local Plan is genuinely sustainable and in accordance with National Policy.

## 2. GENERAL COMMENTS ON SA METHODOLOGY:

2. 1. BNG has some broader concerns about the methodology used to undertake the Sustainability Appraisal. A voluminous amount of case law on SA has focused on the issues of reasonable alternatives and inadequate exploration of them. Article 5(1) of the SEA Directive and regulation 12(2) of the SEA Regulations requires that the environmental report must identify, describe and evaluate the likely significant effects of the reasonable alternatives to the plan taking into account the objectives and geographical scope of the plan.
2. 2. BNG feel that not all “reasonable alternatives” have been reviewed the most obvious example being the approach to Green Belt selection for housing allocations/provision.
2. 3. The SA asserts that “*Alternatives to the housing number have not been calculated since the identified housing figure in the Local Plan corresponds with the national standard methodology*” when frankly a lower housing number would also seem to be an obvious alternative to at least consider given the scale of Green Belt release envisaged and the related carbon harm.
2. 4. As already explained, BNG feel that the SA has not (properly) considered other strategies for carbon reduction. Similarly, the SA does not make it clear that this has not been done and that its approach was simply considering an average number applied equally across all sites, when in fact different sites are likely to have different carbon footprints.
2. 5. The point being that because of its failings regarding proper analysis of the carbon footprint, the SA has not analysed (properly) the competing carbon consequences of the different spatial strategies. This goes to the heart of one of the “objectives” of the Plan itself – see Table 4.1- which includes as Objective 4, seeking to “Minimise the districts’ contribution to climate change” – yet there has been no proper analysis done of the carbon strategies for such a key objective.
2. 6. Guidance on appropriate methodology can be found in R (*Calverton Parish Council v Nottingham City Council*) [2015] EWHC 1078 (Admin) where Jay J. summarised the approach that should be taken:

*“(1) It is necessary to consider reasonable alternatives, and to report on those alternatives and the reasons for their rejection;*

*(2) While options may be rejected as the Plan moves through various stages, and do not necessarily fall to be examined at each stage, a description of what alternatives were examined and why has to be available for consideration in the environmental report;*

*(3) It is permissible for the environmental report to refer back to earlier documents, so long as the reasons in the earlier documents remain sound;*

*(4) The earlier documents must be organised and presented in such a way that it may readily be ascertained, without any paper chase being required, what options were considered and why they had been rejected;*

*(5) The reasons for rejecting earlier options must be summarised in the final report to meet the requirements of the SEA Directive;*

*(6) Alternatives must be subjected to the same level of analysis as the preferred option.”*

2. 7. BNG will make comment separately on several of these issues in its corresponding Regulation 19 Submission on the draft Local Plan specifically about the lack of earlier documents being organised and presented in a way that may be readily ascertained. Indeed, the BNG experience was more akin to the “paperchase” that Jay J suggested should be avoided but which was necessary for anyone to undertake when reviewing the evidence to follow the Green Belt site selection & appraisal process.
2. 8. Accordingly, BNG feel that in order to be “sound”, a reappraisal of certain topics, including Green Belt site selection is required.
2. 9. BNG would also question how the Local Authority can purport to have a “climate change mitigation/adaptation” section in their table on sites when it also appears, they haven’t done any site-specific analysis of this (from the copy emails BNG have been sent in response to the previously mentioned FoI request). BNG asserts that this undermines the whole SA and the purpose of the strategic environmental assessment and is not compliant with the requirement to “identify, describe and evaluate” and assess alternatives.
2. 10. Other aspects of the SA that are linked to the Local Plan can similarly be criticised for unsound or incomplete methodology.

For example;

- a. N34 says that the SA assessments for housing sites demonstrated “*that all sites would have mixed effects with regards to sustainability. It is not possible to identify a best performing option*” – but in fact the LPA did not do a site-specific carbon analysis. BNG must criticise the lack of a framework to facilitate a best performing option against the spatial strategies and their competing carbon footprints. Again, this point cross refers to BNG’s separate comments within its Regulation 19 Consultation submission on Green Belt site selection which combined with third party evidence attached as an Annex therein, justifies a review of the Green Belt site selection.
- b. The LPA set out at 8.1.3 how important vehicle emissions are but this is not carried through to create more aspirational policies within the Local Plan nor does the SA advocate more visionary policies e.g. car free schemes, nor can BNG see that sites are analysed as to their likely vehicle emissions
- c. 8.1.6 talks about loss of vegetation and carbon impacts which again should be taken into account for Green Belt releases but while the Evidence Base makes reference in various documents to lost Green Infrastructure (GI) there does not appear to be any attempt that BNG could find to quantify this and weigh this factor against other alternatives. Again the difficulty in cross referring evidence further points to a “paperchase”.
- d. The SA refers to policies which are asserted to be “mitigation” at Box 8.2 but it is difficult to understand how such policies are effective as they lack assessment and appear weak. (20% renewable is not aspirational and the policy is feebly worded; reducing reliance on private car is not aspirational compared to seeking to move towards no cars etc)

2. 11. Other areas of general concern relate to N37. Namely that *“all sites could potentially contain habitats or species of principal importance and/or sites designated for nature conservation”* when in fact greater assessment could have identified this more closely which is a failure to *“identify, describe and evaluate the likely significant effects on the environment”* of the plan on biodiversity, fauna, flora, soil, etc.
2. 12. BNG have attempted to provide some illustrative information on this subject in respect of the Lye Green site at Chesham. The information on site biodiversity and habitats is contained as an Annex to its separate Regulation 19 submission on the Local Plan. Such basic analysis should have formed a vital component in any Green Belt site selection process and should also have been advocated by the SA when appraising the spatial strategy of the use of Green Belt against other alternatives.
2. 13. In light of all the foregoing comments, BNG fail to see how the SA can describe the Lye Green site at Chesham in Table N2 in the terms that it does. Namely; *“The site can make a very significant contribution to meeting the development needs of the Districts in a highly sustainable location. The impacts on the Green Belt can be mitigated and a firm and defensible boundary either exists or can be provided. The benefits of the release of the site and its subsequent development clearly outweigh the negatives”*.
2. 14. The SA process has failed to consider all reasonable alternatives, as well as failing to consider the site’s biodiversity and wildlife habitats whilst also failing to quantify the carbon footprint of the site, together with the loss of GI from its development.
2. 15. Given the site is located within a few hundred yards of an AQMA, the potential impacts on air quality from a combination of increased local traffic generated from this development together with lost GI are similarly not quantified or appraised. Again, BNG have attempted to provide some illustrative information on the subject of traffic generation contained as an Annex to its separate Regulation 19 submission on the Local Plan. This is a further example of work that should have been done by the LPA which, had it been undertaken previously, could well have removed this site from further consideration and as such is further justification for a review of this site from consideration for development.
2. 16. The evidence on traffic appraisal annexed to the BNG Regulation 19 submission on the Local Plan regarding the Lye Green site also reveals that Lye Green is anything but a *“highly sustainable location”*. Indeed, the conclusion by third part consultants SLR Consulting, is that the site is not a sustainable location due to its distance from the town center and the train station, the paucity of regular buses and most notably the difficult hilly topography that discourages walking and cycling but which conversely encourages car use.
2. 17. The impacts on the Green Belt from developing the Lye Green Chesham site are unclear because they have not been fully or properly assessed due to deficiencies in the SA methodology. The reference to defensible boundary suggests the roads would form this boundary leaving almost half the site exposed to further development once Green Belt status is removed.
2. 18. As the SA contains little guidance on mitigation measures, BNG assert it is frankly impossible to assert that *“...the benefits of the release of the site and its subsequent development clearly outweigh the negatives”*.
2. 19. BNG have been considering commissioning a third-party expert review of the SA in light of its concerns and will explain this in the Conclusion to this submission.

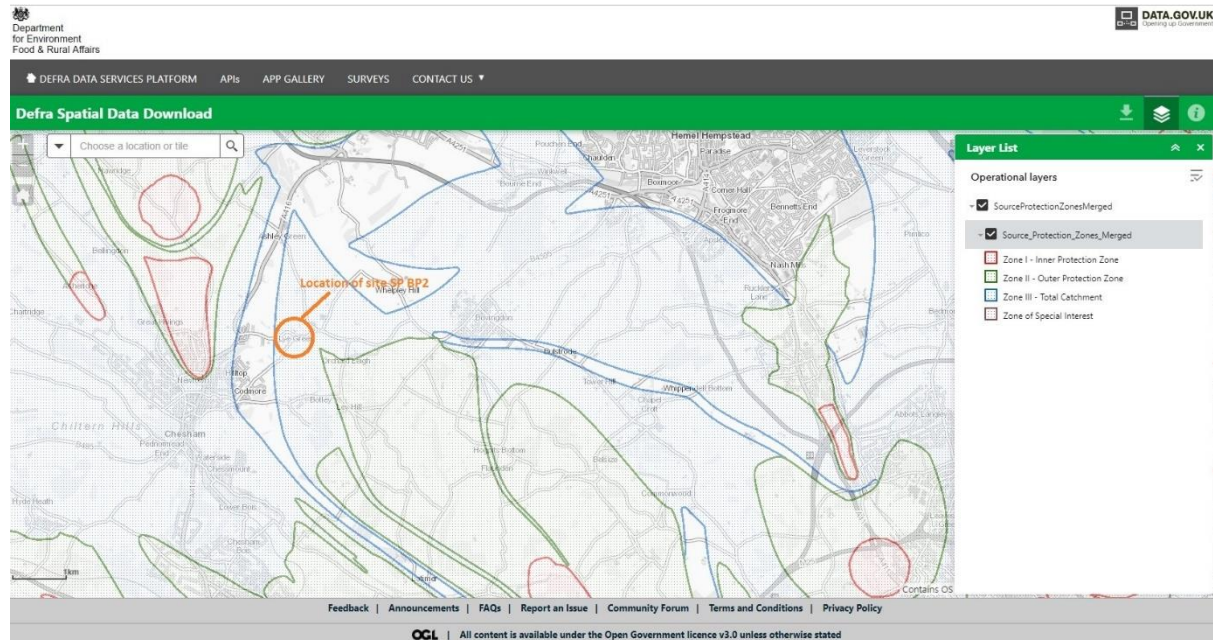
### 3. WATER MANAGEMENT & POLLUTION

3. 1. Paragraph N9 of the SA raises additional concerns regarding Water Management; as it states, *"Without water management measures, flood risk would be likely to increase. An increased water demand would be expected as a result of the increase in population"*.
3. 2. Water management is of great concern to Chesham. Aside from historical flooding that has occurred within the town from surface water runoff and antiquated drainage infrastructure, the River Chess, after which the town is named, flows through the town and is a chalk stream river. As such it is a globally scarce resource with 85% of the worlds chalk streams being located in England.
3. 3. Chalk streams support an abundance of wildlife, flora & insects and makes a significantly important contribution to biodiversity in the area. (see later comments on biodiversity)
3. 4. Unfortunately, the River Chess and other local chalk streams are under threat both from pollution (inc from material draining into the river from surface water run off) but primarily from low water levels and flow rates.
3. 5. BNG have attempted to provide some illustrative information on the subject of Chalk Streams and the threats posed to this rare global resource, which again is contained as an Annex to BNG's separate Regulation 19 submission on the Local Plan.
3. 6. Climate change may account for some of the low water levels, but it is widely accepted that excessive water abstraction from the aquifer that feeds the chalk stream is a major contributory factor.
3. 7. The SA identifies in paragraph N60.that, *"None of the potential Green Belt removal locations are anticipated to have a positive effect on water quality due to the significant increase in demand on water demand and treatment facilities."*
3. 8. Given that the SA also places great emphasis on the important of water Source Protection Zones (SPZ's – see paragraphs N49 & N60), it seems perverse that the allocation of proposed development at Lye Green NE of Chesham is not identified as being an unsuitable location for development purely on grounds of risk to the aquifer and the adjacent River Chess alone.
3. 9. Desktop research by reference to the Defra website, shows the site at Lye Green is located within a SPZ and as such there is risk both from pollution to groundwater and from any abstraction. Specifically, it shows the Lye Green allocation site lies within Zone III Outer Catchment of SPZ -

See Fig 1 on the following page;



**Figure 1 – Water Source Protection Zone around Chesham**  
(Lye Green Sire SP BP2 marked in orange)



3. 10. The SA states in paragraph N60 that, “*Water pollution may also be of concern for options within groundwater Source Protection Zones*”.
3. 11. Given that other areas around Chesham are NOT within the SPZ, and according to the SA paragraph N49, ALL Green Belt development option sites are located in a SPZ, it seems inconsistent that the SA is not encouraging the LPA to consider other options for development such as;
  - Elsewhere around the town or
  - elsewhere within the District without using any of the Green Belt sites or
  - to revisit other Green Belt sites that might not be in a SPZ instead.
3. 12. In terms of water abstraction & pollution risks, such alternatives would be more sustainable especially given the SA comment in paragraph N60 adds that “*...There is a risk of contamination of open or ground water during the construction phase of a development*”. BNG would add that there is a risk of contamination even after development if Sustainable Drainage Systems are not provided or prove to be ineffective at a specific location.
3. 13. Given paragraph N26 when reviewing the Spatial Strategy for the Emerging Local Plan concluded that “*SA assessments for the spatial strategy were largely uncertain at this stage. This was due to the limited level of detail available. As such, it was not possible to identify a best performing option*”. Paragraph N34 added that “*SA assessments for housing sites demonstrated that all sites would have mixed effects with regards to sustainability. It is not possible to identify a best performing option*” (BNG highlighting).

3. 14. Accordingly, it seems strange not to prompt for a further review of the Green Belt and other strategies to see if further evidence would “tip the balance” away from the Green Belt options.
3. 15. BNG have concluded that further review of the SA in relation to the important consideration regarding water abstraction and pollution risk is warranted in light of the above.

#### 4. BIODIVERSITY & HABITATS:

4. 1. The SA in paragraph N6, acknowledges that national policies require an overall net gain in biodiversity, yet paragraph N37 later confirms that “*All sites have been assessed as having negative effects on biodiversity*”. This is a cause of concern in itself as any Local Plan predicated on a SA asserting such a fact is clearly contrary to National Policy and requires further review.
4. 2. The SA goes on to describe the potential effects of the Local Plan proposals upon habitats and conservation.
4. 3. Paragraph N56 states “*A significant potential issue to be considered for Green Belt locations is the fragmentation of habitats following development, reducing the connectivity of habitats within the districts. Priority habitats vulnerable to adverse effects through development include chalk grassland, mature hedgerows and ancient woodland. Any priority species associated with these habitats are also vulnerable to adverse effects.*” It further describes how chalk grassland promotes high biodiversity of insects and butterflies and how invertebrate and bird biodiversity is potentially vulnerable from increased traffic.
4. 4. The SA confirms that the Districts support a diverse range of natural habitats. The proposed allocation site at Lye Green NE of Chesham is one such site that provides a habitat for a variety of species.
4. 5. It is also a chalk escarpment with generally large areas of grassland with some areas of dense woodland and hedgerows and as such features are described in the SA as supportive of an array of insects and butterflies. Such features and the preponderance of insects & butterflies are visibly apparent upon the Lye Green site NE of Chesham.
4. 6. Accordingly, various BNG supporters have undertaken a high-level review of the Lye Green site in terms of biodiversity and wildlife habitats which suggests further work should be done BEFORE the land is removed from Green Belt protection and allocated for development. This information is included as an Annex to BNG’s separate submission under the Regulation 19 Consultation.
4. 7. A number of BNG supporters have a wealth of experience in wildlife & ornithology. They have commissioned a search of known species recorded on the Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC)<sup>1</sup> and have also collated their own evidence of biodiversity upon the Lye Green site allocated for development which includes local reports of birds seen on the Lye Green site that are currently listed on the “red” (endangered) list and the “yellow” (threatened) list at Lye Green. Bats are also well established in various areas within the site as are Badgers on site too.

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<sup>1</sup> <http://www.bucksmkerc.org.uk/>

4. 8. There is no evidence of any research into such matters being undertaken by the LPA which BNG feel should be undertaken before Green Belt designation is removed and not as some precondition to development.
4. 9. As previously mentioned, the Lye Green site NE of Chesham is near to the River Chess and is located within a water source protection zone. The Chess is a chalk stream river and as such is globally rare resource that supports many different types of aquatic & insect species. These include, water voles, brown trout & kingfishers but the high mineral content of the water creates an abundance of other flora, fauna & insects upon which other wildlife depend. The range of biodiversity dependent upon such chalk streams is significant.
4. 10. Unfortunately, the River Chess is under threat and has been predominantly dry for several years including during the winter months when high rainfall should raise the aquifer level that feeds the river. The fact it has remained predominantly dry in recent years is a cause for concern for the biodiversity it normally supports and possibly indicative of over abstraction of water to serve increasing local population.
4. 11. Additional development leads to greater demand for water (as confirmed in the SA - para N9) with further strain then placed upon the river. Therefore, the effects upon local biodiversity in Chesham are significant. These would be contrary to NPPF (para 8 – encourages improved biodiversity) and would also be contrary to NPPF paragraphs 141, 149, and specifically paragraphs 170a & 170d which require planning policies to minimise impacts and provide net gains for biodiversity.
4. 12. Other considerations include;
- Wildflowers and trees need land to grow, animals need space in which to hunt, forage, sleep and breed.
  - Ring fencing a tree with a bat roost and allowing so many metres of green space around it and then developing the rest of the land it lives off simply does not work.
  - Over 50% of bat rescues are a result of cat attacks, over half do not survive and 30% of the survivors cannot return to the wild.
  - Domestic cats have a similar impact upon birds and small mammals. Bats are affected by artificial lighting which can delay emergence from the roost and result in the insufficient feeding of their young.
  - One of the key threats to hedgehogs is the reduction of hunting range (they require 1-2 km territory) due to the erection of garden fences in most housing schemes.
  - Garden pesticides cause a wide range of problems from depleting prey for insectivores or poisoning prey which then goes up the food chain.
  - Garden netting causes many injuries/deaths to wildlife annually.
  - Wild animals navigating roads often leads to predation through exposure or death by being hit by a vehicle.
4. 13. Urban sprawl is a major factor in the overall decline of our national wildlife and cannot be ignored. The UK has now become one of the most nature depleted countries in the World – ranked 189<sup>th</sup> out of 218, yet local authorities are continuing to erode wildlife habitat by offering up green belt land for development.
4. 14. Loss of good quality soil is also a concern. Paragraph N12 of SA says Chiltern and South Bucks contains a large quantity of high-quality agricultural land, consisting mainly of ALC Grade 3, with a small amount of Grade 2 land.

4. 15. Paragraph N40 of the SA states that, *“Development at some sites would lead to a loss of best and most versatile agricultural land “*. This appears to be true of the site at Lye Green NE of Chesham where enquiries with Natural England and other sources reveal the site is mainly Grade 3 agricultural land with the possibility of part of the land being Grade 3a (ie: Best & Most Versatile – BMV).
4. 16. It is simply not sustainable to allocate BMV agricultural land for development. Further research needs to be done before the land is allocated for development to establish the facts and which areas of the land are inappropriate or too valuable to be lost to development.
4. 17. BNG are concerned about the absence of research into the potential effects at Lye Green BEFORE the decision is taken to remove the site from Green Belt designation, which they regard as the most effective policy for preservation of the countryside and the habitats and biodiversity it supports.

5. AIR QUALITY:

5. 1. In terms of air quality, the SA acknowledges (in paragraph N16) that (amongst many other things) there is,
- *“High reliance on personal car use and high levels of commuting to and from Chiltern and South Bucks“, and*
  - *“Low rates of commuting via public transport“, and*
  - *“Presence of AQMAs within the Plan area“, (the latter being of particular concern to Chesham due to the levels of congestion in the town and a particularly troublesome AQMA that is prevailing there);*
- yet, Chesham is still earmarked for some significant development including an allocation for over 500 homes to be built on Green Belt land just a few hundred meters from an AQMA.
5. 2. The development of this Green Belt site is acknowledged to result in the loss of some local Green Infrastructure (GI) with the very real fear that Chesham may suffer localized environmental damage or further worsening air quality. No evidence is offered by the Local Authority to address this concern.
5. 3. Given that the SA in paragraph N61 asserts that, *“... Whilst development adjacent to AQMAs is likely to result in poor air quality at the option(s), it is also anticipated to compromise efforts to reduce traffic thus preventing efforts to deal with the cause of the AQMA. The loss of GI, the extent of which varies between options, is likely to have a further negative effect on the local air quality by diminishing the natural local air filtering function of the vegetation.”*
5. 4. Furthermore, paragraph N8 advised that *“Despite the Buckinghamshire County Council Local Transport Plan, it would be likely that increases in traffic and congestion, and consequently a reduction in local air quality, would occur to some extent”*.
5. 5. As such BNG feel that a further review of the SA and a detailed explanation is required to ensure any local air quality impact upon Chesham is mitigated by considering alternative options that would not risk further compromising air quality or that the Air Quality Management Plan is as effective as it can be.

## **CONCLUSION:**

The SA raises several areas of concern as self evidently the Local Plan is based upon many of its conclusions and findings.

There are serious concerns raised by the SA generally. The most important of these are in respect of;

- Carbon Footprint increase
- General SA methodology (notably failure to consider all reasonable alternatives)
- Air Quality
- Water Management/pollution
- Biodiversity & habitats

Certain issues are not adequately addressed. Mitigation is not explained sufficiently. Most importantly, the SA recognises adverse effects that are contrary to the NPPF.

**BNG are looking into commissioning a third-party expert review of the SA but time has not permitted this to be fully researched at the time of making this submission.**

**This is also another potentially expensive area for such a community group and there are fundraising implications but BNG highlight this aspiration in the hope that if funds can be raised in time for a SA review to be undertaken, it would hope it could submit this as further evidence before the commencement of any Examination Hearings?**

Many of the issues raised herein raise further questions about the efficacy and sustainability of allocating Green Belt Land at Lye Green NE of Chesham for development. This leads BNG to the further conclusion that the SA needs further review and research before the Local Plan should move forward or itself be subject to major modification.

Submitted by  
Phillip J Plato FloD DipSurv MRICS  
On behalf of Brown Not Green Chesham Ltd

August 2019

Encs....

**ANNEX A** – Info from LPA regarding carbon footprint computation

## **ANNEX A – Response to BNG FoI Request – Info re Carbon Footprint computation**

(Exc Excel Spreadsheet entitled – “UK local authority and regional carbon dioxide emissions national statistics: 2005-2016”)

## Phillip Plato

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**From:** John Cheston <John.Cheston@chilternandsouthbucks.gov.uk>  
**Sent:** 07 August 2019 12:02  
**To:** Phillip Plato  
**Subject:** EIR and FOI request relating to the Chiltern and South Bucks Local Plan Sustainability Appraisal report [OFFICIAL]  
**Attachments:** 2005-16\_UK\_local\_and\_regional\_CO2\_emissions.xlsx; [EXTERNAL] - Re: Joint Local Plan [OFFICIAL]; Re: [EXTERNAL] - FW: SA Carbon Emissions query - urgent [OFFICIAL]

Dear Mr Plato

Thank you for your request for further information regarding the carbon footprint figure set out in the published Sustainability Appraisal report which supports the draft joint Local Plan.

This email comprises a slightly more comprehensive response to your recent request under the Environmental Information Regulations and the Freedom of Information Act which includes information which I received after the formal response to you was issued.

### **How the carbon footprint figure was quantified by your consultants (LEPUS) including the modelling methodology and information used that supports the 21% increase in carbon footprint**

The Lepus Consulting Limited calculations are based on Government carbon dioxide emissions statistics from 2016 (see attached spreadsheet, taken from <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>).

This indicates a carbon footprint of **1,195,200 tonnes/year**, with **7.8 tonnes of CO<sub>2</sub> per person**.

According to dwelling stock estimates (<http://opendatacommunities.org/data/housing-market/dwelling-stock/tenure>) and population figures from the 2011 census (<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/2011censuspopulationandhouseholdestimatesfortheunitedkingdom>) Lepus calculated an average of occupancy rate of **2.33 people per dwelling** in Chiltern and South Bucks.

A breakdown of Lepus Consulting Carbon Emissions calculations is as follows:

1% of 1,195,200 tonnes/year CO<sub>2</sub> = 11,952 tonnes. Per person (divided by 7.8 tonnes), this equates to an increase in 1,532 residents. At 2.33 people per dwelling, Lepus would expect approximately 658 homes to hold 1,532 residents.

Therefore, the development of **658 homes** would equate to an approximate 1% increase in CO<sub>2</sub> emissions.

Lepus identified that the development of **14,043 homes** is proposed in the Local Plan, in Chiltern and South Bucks (total housing number, minus those being provided in Aylesbury Vale District).

14,043 homes divided by 658 indicates an approximate increase of 21.3%.

Therefore, the Chiltern and South Bucks Local Plan would be expected to result in an increase in CO<sub>2</sub> emissions of approximately 21%, based on the emissions from 2016.

These figures are only intended as an estimate, and do not take into account mitigation measures or national trends.

Revisiting the carbon emissions figure:

Lepus will be revisiting the 21% carbon emissions figure to use the total supply of homes figure in Table LPb: Homes - Requirement and Supply, on page 53 of the published joint Local Plan which states that the total supply is **11,099** homes, rather than 14,043, which is the figure of net housing need. This will be updated in an addendum to the currently published Sustainability Appraisal report on the Chiltern and South Bucks websites - <https://www.southbucks.gov.uk/planning/localplan>.

11,099 homes divided by 658 indicates an approximate increase of 16.9%.

We would anticipate that the Lepus revised calculations will identify that the Chiltern and South Bucks Plan would be expected to result in an increase in CO<sub>2</sub> emissions of approximately 16.9%, based on emissions from 2016.

**All internal memos and emails within the LPA relating to the calculation of that figure**

Please also find attached all internal and external email exchanges regarding the calculation of the carbon emissions figure, along with an Excel spreadsheet containing the 2005-2016 UK local and regional CO<sub>2</sub> emissions figures sourced from national statistics. There are no memos or emails which relate to the original calculation of the carbon emissions figure included in the Sustainability Appraisal report.

I hope that this is helpful.

Regards

John

**John Cheston**

Planning Policy and Economic Development Manager  
Chiltern District Council and South Bucks District Council  
Email: [John.Cheston@chilternandsouthbucks.gov.uk](mailto:John.Cheston@chilternandsouthbucks.gov.uk)  
Telephone: 01494 586506  
Mobile: 07725 752395





## Phillip Plato

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**From:** chiltern@infreemation.co.uk  
**Sent:** 07 August 2019 09:33  
**To:** Phillip Plato  
**Subject:** [CFOI/18252] Freedom of Information & Environmental Information Request - carbon footprint  
**Attachments:** 2005-16\_UK\_local\_and\_regional\_CO2\_emissions.xlsx; Re\_ [EXTERNAL] - FW\_ SA Carbon Emissions query - urgent [OFFICIAL].pdf

Dear Phillip Plato

Further to our acknowledgement to your email requesting information. The Council is dealing with your request under the provisions of Environmental Information Regulations 2004 we are providing you with our response.

Your query relates to the Sustainability Appraisal report which was prepared earlier this year by Lepus Consulting Limited on behalf of Chiltern District Council and South Bucks District Council to support the draft joint Local Plan.

### RESPONSE

Lepus have advised us that their calculations are based on Government carbon dioxide emissions statistics from 2016 (see attached spreadsheet, taken from <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>). This indicates a carbon footprint of 1,195,200 tonnes/year, with 7.8 tonnes per person.

According to dwelling stock estimates (<http://opendatacommunities.org/data/housing-market/dwelling-stock/tenure>) and population figures from the 2011 census(<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/2011censuspopulationandhouseholdestimatesfortheunitedkingdom>), Lepus calculated an average of 2.33 people per dwelling in Chiltern and South Bucks.

A breakdown of Lepus' calculations is as follows:

1% of 1,195,200 tonnes/year CO2 = 11,952 tonnes. Per person (divided by 7.8 tonnes), this equates to an increase in 1,532 residents. At 2.33 people per dwelling, Lepus would expect approximately 658 homes to accommodate 1,532 residents. Therefore, the development of 658 homes would equate to approximately a 1% increase in CO2 emissions.

Lepus say that they were informed that the development of 14,043 homes is proposed in the Plan, in Chiltern and South Bucks (total housing number, minus those being exported to Aylesbury). 14,043 homes divided by 658 indicates an approximate increase of 21.3%.

Therefore, the Chiltern and South Bucks Local Plan would be expected to result in an increase in CO2 emissions of approximately 21%, based on the emissions from 2016. These figures are only intended as an estimate, and do not take into account mitigation measures or national trends. In fact, it would appear that Lepus have misread Table LPb in the Local Plan which makes clear that 11,099 homes (column K) are to be built in the districts over the plan period, allowing for up to 5,750 homes to be built in Aylesbury Vale District. Applying this figure to Lepus' calculations give a figure of approximately 16.9%.

We hope this answers your questions, but if not, you can contact us with your query quoting the case reference number provided. You can also seek an internal review of your request if you remain unhappy with the outcome. Ultimately you can complain to the Information Commissioner should you remain dissatisfied, having exhausted the authority's internal review procedures. If you would like more information about the role and work of the Information Commissioner go to the website <https://ico.org.uk/>.

Yours Sincerely

Chiltern District Council

## Phillip Plato

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**From:** Laura Beveridge <laura.beveridge@lepusconsulting.com>  
**Sent:** 17 July 2019 09:17  
**To:** Jon Wellstead  
**Cc:** Neil Davidson; Catherine Wright; David Waker  
**Subject:** [EXTERNAL] - Re: Joint Local Plan [OFFICIAL]

\*This message has originated from outside of the Chiltern and South Bucks network. Please be vigilant when opening links or carrying out actions.\*

Hi Jon,

Thanks for this update.

We will add these figures as well as other amendments to the SA report accordingly.

Thanks,

Laura

**Laura Beveridge** MSci (Hons)  
**Environmental Consultant**  
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**From:** Jon Wellstead  
**Date:** Tuesday, 16 July 2019 at 11:06  
**To:** Laura Beveridge  
**Cc:** Neil Davidson , Catherine Wright , David Waker  
**Subject:** RE: Joint Local Plan [OFFICIAL]

Dear Laura,

Thank you for taking the time to discuss amendments to the CO2 Emissions section of the SA Report.

Table LPb: Homes – Requirement and Supply, on page 53 of the published Joint Local Plan states that the total supply is 11,099 no. of homes, rather than 14,043 which is the net housing need. Could you please amend this in the SA Report?

Web link:

[https://www.chiltern.gov.uk/media/13288/Draft-Chiltern-and-South-Bucks-Local-Plan-2036/pdf/draft\\_Chiltern\\_and\\_South\\_Bucks\\_Local\\_Plan\\_2036\\_Final.pdf?m=636954976691670000](https://www.chiltern.gov.uk/media/13288/Draft-Chiltern-and-South-Bucks-Local-Plan-2036/pdf/draft_Chiltern_and_South_Bucks_Local_Plan_2036_Final.pdf?m=636954976691670000)

Regards

Jon Wellstead  
Senior Planner (Planning Policy)  
Tel: 01494 586692  
Email: [Jon.Wellstead@chiltern.gov.uk](mailto:Jon.Wellstead@chiltern.gov.uk)  
Email: [Jon.Wellstead@southbucks.gov.uk](mailto:Jon.Wellstead@southbucks.gov.uk)



## Phillip Plato

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**From:** Laura Beveridge <laura.beveridge@lepusconsulting.com>  
**Sent:** 12 June 2019 10:22  
**To:** Neil Davidson; Simon Meecham  
**Cc:** Jon Wellstead; John Cheston; David Waker  
**Subject:** Re: [EXTERNAL] - FW: SA Carbon Emissions query - urgent [OFFICIAL]

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi all,

Neil is out of the office this morning.

I have recalculated the carbon emission figures:

- CSB whole plan (14,043 total housing number, as used in the SA Report) would result in an increase of **approximately 21.3%**
- CSB alone (14,043 total housing number minus 5,750 exported to AVDC = 9,882 houses) would result in an increase of **approximately 15%**
- CSB (9,882 houses) and AVDC export (5,750 houses) together, incorporating the national data for Aylesbury, would result in an increase of **approximately 21.7%**

These figures are estimates, and do not take into account additional mitigation measures/national trends.  
I hope this removes any confusion.

Thanks,  
Laura

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**From:** Neil Davidson  
**Date:** Tuesday, 11 June 2019 at 18:11  
**To:** Simon Meecham , Laura Beveridge  
**Cc:** Jon Wellstead , John Cheston , David Waker  
**Subject:** Re: [EXTERNAL] - FW: SA Carbon Emissions query - urgent [OFFICIAL]

Hi Simon,

Noted. And thank you.

We have not attempted to incorporate transboundary details like this because it all gets monstrously complicated and involves more detailed studies and obviously more budget. Climate change is worth it though, I would argue.

There are already a number of assumptions associated with the carbon emissions calculations which leave it vulnerable but it is better than no figure at all.

We can re-calculate the figure with the discounted houses going to AVDC (c5k) and the plan figure (c10k). And update the assumptions information.

I will have a look at the AVDC SA work in the morning.

We will supply all three scenarios and see what they look like (eg CSBC alone, CSBC whole plan, and CSBC (geographic boundary only + AVDC export).

Many thanks again for this helpful information.

Have a good evening.

Neil

**Neil Davidson** CEnv MCIEEM CMLI  
Director

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**From:** Simon Meecham  
**Date:** Tuesday, 11 June 2019 at 17:56  
**To:** Neil Davidson , Laura Beveridge  
**Cc:** Jon Wellstead , John Cheston , David Waker  
**Subject:** Re: [EXTERNAL] - FW: SA Carbon Emissions query - urgent [OFFICIAL]

Hi Neil,

That does not make sense - AVDC has included this number in fact 5750 for CSB in their plan - your SA is sequentially later and so can take account of that - otherwise the carbon is double counted.

Thanks  
Simon

---

**From:** "Neil Davidson" <[neil.davidson@lepusconsulting.com](mailto:neil.davidson@lepusconsulting.com)>  
**Date:** Tuesday, 11 June 2019 at 17:31:31  
**To:** "Simon Meecham" <[Simon.Meecham@chilternandsouthbucks.gov.uk](mailto:Simon.Meecham@chilternandsouthbucks.gov.uk)>, "Laura Beveridge" <[laura.beveridge@lepusconsulting.com](mailto:laura.beveridge@lepusconsulting.com)>  
**Cc:** "Jon Wellstead" <[Jon.Wellstead@chilternandsouthbucks.gov.uk](mailto:Jon.Wellstead@chilternandsouthbucks.gov.uk)>, "John Cheston" <[John.Cheston@chilternandsouthbucks.gov.uk](mailto:John.Cheston@chilternandsouthbucks.gov.uk)>, "David Waker" <[David.Waker@chilternandsouthbucks.gov.uk](mailto:David.Waker@chilternandsouthbucks.gov.uk)>  
**Subject:** Re: [EXTERNAL] - FW: SA Carbon Emissions query - urgent [OFFICIAL]

Hi Simon

You can't apply administrative boundaries to climate change, unfortunately.

Neil

Get [Outlook for iOS](#)

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**From:** Simon Meecham  
**Sent:** Tuesday, June 11, 2019 5:23:45 PM  
**To:** Neil Davidson; Laura Beveridge  
**Cc:** Jon Wellstead; John Cheston; David Waker  
**Subject:** Re: [EXTERNAL] - FW: SA Carbon Emissions query - urgent [OFFICIAL]

Hi Neil / Laura

The wrong calculation has been used as we are exporting 4,161 homes to Aylesbury- it at least needs both figures,  
Thanks  
Simon

---

**From:** "Neil Davidson" <[neil.davidson@lepusconsulting.com](mailto:neil.davidson@lepusconsulting.com)>  
**Date:** Tuesday, 11 June 2019 at 16:55:40  
**To:** "David Waker" <[David.Waker@chilternandsouthbucks.gov.uk](mailto:David.Waker@chilternandsouthbucks.gov.uk)>  
**Cc:** "Jon Wellstead" <[Jon.Wellstead@chilternandsouthbucks.gov.uk](mailto:Jon.Wellstead@chilternandsouthbucks.gov.uk)>, "John Cheston" <[John.Cheston@chilternandsouthbucks.gov.uk](mailto:John.Cheston@chilternandsouthbucks.gov.uk)>, "Simon Meecham" <[Simon.Meecham@chilternandsouthbucks.gov.uk](mailto:Simon.Meecham@chilternandsouthbucks.gov.uk)>, "Laura Beveridge" <[laura.beveridge@lepusconsulting.com](mailto:laura.beveridge@lepusconsulting.com)>  
**Subject:** [EXTERNAL] - FW: SA Carbon Emissions query - urgent [OFFICIAL]

\*This message has originated from outside of the Chiltern and South Bucks network. Please be vigilant when opening links or carrying out actions.\*

Hi David,

Please find attached our response re the carbon emissions per capita (see Laura's email).

I would add that a precautionary approach is in order since the SEA Directive and all European environmental legislation operates under the principles of the Precautionary Principle. The following text has been reproduced from the first page of the Directive:

1. Article 174 of the Treaty provides that Community policy on the environment is to contribute to, *inter alia*, the preservation, protection and improvement of the quality of the environment, the protection of human health and the prudent and rational utilisation of natural resources and that it is to be based on the precautionary principle. Article 6

of the Treaty provides that environmental protection requirements are to be integrated into the definition of Community policies and activities, in particular with a view to promoting sustainable development.

Without evidence to prove that there will be a drop in carbon emissions, a precautionary approach is appropriate until such evidence becomes available.

Thanks,

Neil

**Neil Davidson** CEnv CIEEM CMLI  
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**From:** Laura Beveridge  
**Date:** Tuesday, 11 June 2019 14:38  
**To:** Neil Davidson  
**Subject:** Re: SA Carbon Emissions query - urgent [OFFICIAL]

As explained in Table 4.5 in the SA Report, estimates of carbon emissions are taken from the UK authority and regional carbon dioxide emissions national statistics.

The carbon footprint for the Plan area in 2016 was 1,195,200 tonnes/year, which gives an average of 7.8 tonnes per person.

There are on average 2.33 people per dwelling in the Plan area according to the 2011 census.

Therefore, approximately 658 homes would contain 1,532 residents. This would represent an increase of 11,953 tonnes/year which is 1% of the annual carbon footprint for the Plan area.

The housing need across the Plan period is 15,260 homes. 1,217 of these have already been completed, leaving a remaining housing need of 14,043 homes.

If 658 dwellings would result in an increase in carbon emissions by 1% of the total carbon emissions for the Plan area, the development of 14,043 dwellings would result in an increase of approximately 21%.

This calculation does not allow for future reductions due to technological improvements etc.

No climate change report has been commissioned by the client team, and this would provide more information regarding carbon emissions projections.

I hope this makes sense!

Laura

**Laura Beveridge** MSci (Hons)



**Environmental Consultant**

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---

**From:** Neil Davidson

**Date:** Tuesday, 11 June 2019 at 13:50

**To:** Laura Beveridge

**Subject:** FW: SA Carbon Emissions query - urgent [OFFICIAL]

Hi Laura,

Please can you have a look at this and draft a response.

I think it needs:

Brief explanation of how we calculate carbon emissions increases.

Reference to any assumptions from the assumptions table

Acknowledgement that we do not allow for future reductions due to for example electric cars.

To identify that no climate change report has been commissioned by the client team and this would provide more info.

Thanks

Neil

**Neil Davidson** CEnv CIEEM CMLI  
Director

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**From:** David Waker  
**Date:** Tuesday, 11 June 2019 13:42  
**To:** Neil Davidson , Catherine Wright  
**Cc:** John Cheston , Simon Meecham , Jon Wellstead  
**Subject:** SA Carbon Emissions query - urgent [OFFICIAL]

Hi can you please respond to Jon's email attached. ( his mailbox is full on return from leave)

regards

David Waker  
Senior Planner (Policy)  
Planning Policy Team  
Chiltern District and South Bucks District Councils

10 July 2019

by post & email - [cdcfoi@chilternandsouthbucks.gov.uk](mailto:cdcfoi@chilternandsouthbucks.gov.uk)

The Freedom of Information Officer  
Chiltern District Council  
King George V House  
King George V Road  
Amersham  
Bucks HP6 5AW

Dear Sir,

**Re: Emerging Local Plan for Chiltern & S Bucks District Council Environmental Information Regulations 2004 ('EIR') & Freedom of Information Act 2000 (Fol) - Sustainability Appraisal by LUPUS June 2019 .**

We refer to the Sustainability Appraisal (SA) produced for the LPA as evidence in support of the emerging Local Plan.

Our organisation has noted that the SA refers to the District's carbon footprint increasing **by 21%** during the Plan Period (see Sustainability Appraisal by LEPUS dated June 2019 - page 33 Table N4 – [www.chiltern.gov.uk/planning/localplanevidence](http://www.chiltern.gov.uk/planning/localplanevidence) ).

We write by way of request under the provisions of either Fol or EIR to ask you to provide the following information;

- How the carbon footprint figure was quantified by your consultants (LEPUS) including,
- The modelling methodology and information used that supports the 21% increase in carbon footprint &
- All internal memos and emails within the LPA relating to the calculation of that figure.

We look forward to hearing from you at your earliest convenience.

Kind regards,

Yours faithful

Phillip J Plato FloD DipSurv MRICS  
ON BEHALF OF BROWN NOT GREEN CHESHAM LTD  
Tel: [REDACTED] – email [REDACTED]

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