

Response to Wycombe District Local Plan Examination Schedule of Matters and Issues

To: Nicola Gulley, Planning Inspector via Ian Kemp, Programme Officer for the Examination of the Wycombe District Council's Plan, 16 Cross Furlong, Wychbold, Droitwich, Worcestershire, WR9 7TA; idkemp@icloud.com

Re: HW9: Part of Greens Farm, Glynswood, Green Hill, High Wycombe

Dear Mrs Gulley,

In relation to HW9 in the Plan, I refer to two points in Matter 11:

1. 'Does the Plan provide an appropriate framework for monitoring policies and proposals?'
2. 'Does the Plan provide clear and effective guidance on implementation, monitoring targets and triggers for review?'

In the former, I am concerned with the 'monitoring of policies' in relation to this Plan, namely the Government's new 25 year Environment Plan for a 'Green Brexit', outlined by the Rt Hon Michael Gove MP, Environment Secretary, and the Department for Environment, Food and Rural Affairs in their Government Press Release of 27-5-18, announcing a Review led by Julian Glover of the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs); as well as the Ministry of Housing, Communities and Local Government's National Planning Policy Framework: Consultation Proposals and Draft Text for Consultation, both of 5 March 2018. This Government Review and the draft National Planning Policy indicate the Government's intentions and also relate to the second point above, concerning 'triggers for review' of the Council's Local Plan. Surely the Plan should be reviewed in the light of these, as I shall outline below.

The proposed 'release site' HW9 is both an AONB and within the Green Belt. Firstly, I shall put the case for its protection as an AONB in view of the pending Glover Review. Secondly, I shall argue for its protection as a site within the Green Belt, bearing in mind the Government's clear intention in the draft National Planning Policy Framework. As both of these are so recent, I would argue that any plan for the site should at least be delayed until the Review is completed and any follow-up action is taken and until the Framework is finalised.

In relation to HW9 as an AONB, Edward Malnick writing in The Telegraph on 26 May 2018 in relation to the review of National Parks and AONB led by Julian Glover and referring to National Parks, quoted Mr Gove's department in explaining that Mr Glover 'will look at both extending existing sites or creating new ones'. The article went on to claim that it 'is likely to consider calls for landscapes, such as the Chilterns and South Devon Areas of Outstanding Natural Beauty (AONB) to join the list of 10 National Parks ... protected by dedicated planning authorities and given special status in law'.

'Earlier this month,' it continued, 'Dame Cheryl Gillan, the former Conservative cabinet minister, warned the Chilterns AONB was "threatened by development on all sides" and said National Park status "would provide safeguards at the highest level".'

The Environment Secretary, in the above press release of 27-5-18, emphasised that he was 'committed to conserve and enhance England's most cherished landscapes as a new review

launches into the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs).' The Department's Press Release went on to clarify that 'weakening or undermining their existing protections or geographical scope will not be part of the review....' The present plan clearly goes against this new government policy and aims to remove HW9 from 'existing protection' and the 'geographical scope' of the Chiltern AONB.

In a previous letter I outlined the biodiversity of this chalk landscape, with flora and fauna dependent upon very specific needs. The Government's Press Release quoted Philip Hygate, Chair of the National Association of AONBs: 'The National Association for AONBs is delighted to support this exciting review and will work closely with Julian Glover and the review panel to help ensure that all of England's special landscapes are equally recognised for the value they provide to the nation, and their fundamental importance to future generations.' The Government's stance cannot be ignored and should 'trigger a review' of the Plan and continued 'monitoring' of Government 'policies'.

In relation to the Ministry of Housing, Communities and Local Government's National Planning Policy Framework, which is in the process of being updated, the following proposals and draft text clarifies the Government's present thinking and also deserves to be monitored. The following passages are relevant to HW9:

1. National Planning Policy Framework: Consultation Proposals: 5 March 2018:

Chapter 13: Protecting the Green Belt (p 20)

'The Framework maintains the strong protections of the Green Belt and retains a high bar before Green Belt land may be released. Paragraphs 136-137 implement the housing White Paper proposals that certain criteria should be satisfied before 'exceptional circumstances' are used to change Green Belt boundaries....' This Green Belt site deserves 'strong protection' and a 'high bar' should be set before 'exceptional circumstances' are considered.

2. National Planning Policy Framework: Draft Text for Consultation: 5 March 2018:

135: 'Once established, Green Belt boundaries should only be altered in exceptional circumstances.... Strategic plans should establish the need for any change to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.' HW9 was surely 'intended' for 'permanence' as a Green Belt site, when it was established as such and the Government's intention that it should 'endure beyond the plan period' is clear in this very recent document.

136: 'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its defined need for development. This will be assessed

through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land.' I doubt 'as much use as possible' has been made of 'suitable brownfield and underutilised land'. Around the area are derelict or unused houses and industrial sites, which could be used, saving the site for flora, fauna and future generations.

144: 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:' a) – g). (pp41-42) None of these exceptions seem to apply, so the 'construction of new buildings' should be regarded as 'inappropriate in' this 'Green Belt' site.

In conclusion, from both an AONB and Green Belt point-of-view and considering your stated criteria and the present Government's clear views based upon two very recent documents, this planned development for HW9 should not proceed or at the very least should be delayed, to be reconsidered after the Government's review and final planning framework. If the conclusion of the review is that the Chiltern AONB is to become a National Park, then this site would come under that protection. As this is a clear consideration it should delay any action that would permanently damage the site.