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# Wycombe District Local Plan Examination

Further Written Statement  
submitted on behalf of Gallagher Estates  
(ID: 0953)

**Matter 6:  
Green Belt**

June 2018



**Wycombe District Local Plan Examination**  
**Response to Inspector's Matters, Issues and Questions**

**Matter 6:  
Green Belt**

**Barton Willmore LLP on behalf of  
Gallagher Estates (ID: 0953)**

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## **INTRODUCTION**

- 1.1 Barton Willmore LLP is instructed by Gallagher Estates to submit this further written statement in response to the Inspector's Matters, Issues and Questions. These representations expand upon the representations submitted on behalf of Gallagher Estates at the earlier stages of the Wycombe District Local Plan's preparation.
- 1.2 Gallagher Estates controls land off Shootacre Lane on the southern edge of Princes Risborough which is promoted for residential development. The site includes land which is identified as part of the 'Area for Comprehensive Development' in order to provide the southern section of the proposed Relief Road. It is not proposed in the Local Plan as an allocation for residential development; it is an omission site.
- 1.3 Our representations submitted in response to the Regulation 19 Local Plan consultation included a Vision Document which presents our client's development proposals for the site.

## **RESPONSE TO INSPECTOR'S QUESTIONS - MATTER 6**

*Issue: Do the exceptional circumstances exist to justify the proposed revision of the Green Belt boundaries and can the need for housing and employment development be accommodated without releasing land from the Green Belt?*

**6.1** *Are the Green Belt Assessment (GB1 and GB2) soundly based, justified and consistent with national policy?*

**a)** *Can the need for housing and employment development be accommodated on deliverable sites within settlement without releasing land from the Green Belt?*

6.1.1 No. As we have set out in our written statement for Matters 2 and 3, the Plan will not meet the full objectively assessed need for housing in the area. We do not repeat the points made this clearly has implications for the Council's approach for the release of Green Belt.

**b)** *Has the capacity of areas within settlement to accommodate growth been robustly assessed and what were the conclusions?*

6.1.2 No comment.

**c)** *How were the removal sites identified and assessed?*

6.1.3 We address this in our response to Q6.2 below.

**d)** *Was an assessment undertaken of the contribution of each of the removal sites to the Green Belt purposes and what were the conclusions?*

6.1.4 No comment.

**6.2** *Is the approach to amending Green Belt boundaries to release sites for development soundly based and is it consistent with the conclusions of the review in respect of their contribution to Green Belt purposes?*

6.2.1 Turning to the first part of the Inspector's question, no, the Council's approach to amending Green Belt boundaries is not soundly based.

6.2.2 We note that paragraph 6.44 of the Council's Housing Topic Paper states that identifying areas of safeguarded land would:

**Involve identification of land that is harmful to the Green Belt and, given that the Plan cannot identify sufficient housing capacity from the Green Belt and elsewhere to meet the housing OAN it would not be appropriate to safeguard additional land by removing it from the Green Belt.**

6.2.3 However, for the reasons set out above, particularly in respect of ensuring that housing need is met at Princes Risborough, we do not consider this approach to be consistent with the approach which is required by national policy. Paragraph 85 of the NPPF states that:

**When defining boundaries, local planning authorities should, where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; and satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.**

6.2.4 In addition, paragraph 83 of the NPPF advises that:

**Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.** (our emphasis)

6.2.5 It is clear that the Council's approach is not consistent with the approach required by national policy is not soundly based. Green Belt boundaries will inevitably need to be altered again at the end of the plan period, if not before. The boundaries are not capable of enduring beyond the plan period.

- 6.2.6 In the absence of the Plan identifying safeguarded land, as a minimum, and/or reserve sites, the approach is not one which we consider is positively prepared or effective.
- 6.2.7 In line with the comments set out above, our written statement for Matter 2, and as we will expand upon in our written statement for Matter 8 in due course, the Council should identify land currently within the Green Belt as reserve sites and/or safeguarded land in order for its approach to Green Belt release to be soundly based. Such sites should be identified in locations consistent with the Spatial Strategy, including Princes Risborough which is recognised as a Tier 2 settlement in Policy CP2 and where the strategy is overly dependent upon the delivery of housing from a single strategic allocation.
- 6.2.8 Secondly, whether the Council's approach is it consistent with the conclusions of the review in respect of their contribution to Green Belt purposes, we note that 'General Area' 17 identified with the Buckinghamshire Green Belt Assessment (March 2016) was assessed as "medium". General Area 17 includes the proposed allocation of land to the rear of Poppy Road (Policy PR11), and the land off Shootacre Lane controlled by Gallagher Estates.
- 6.2.9 By contrast, General Areas 9a and 9b located to the east of Princes Risborough, were assessed as "high" and therefore least suitable for release in order to accommodate development.
- 6.2.10 On that basis, it is unclear how the same assessment arrived at the conclusion that the only 'Recommended Area' (RSAs) suitable for release at Princes Risborough was RSA-4, was land "south of Princes Risborough" which is located within General Area 9a. This site is not proposed for allocation whereas Poppy Road, not supported by the Arup assessment, is allocated.
- 6.2.11 In conclusion, we consider there to be an inconsistency between the Council's approach to Green Belt at Princes Risborough and the findings of the Green Belt Assessment. Importantly, the Council's approach is understood to have taken account of other (non-Green Belt) factors such as, for example, promoting sustainable patterns of development, a key objective set out in national Green Belt policy which does not appear to have been properly considered within the Arup assessment.

**6.3 *Do the exceptional circumstances exist to justify the proposed revision of the Green Belt boundaries?***

6.3.1 Yes, exceptional circumstances, including the housing need which is in excess of the capacity of sustainably-located non-Green Belt land, justifying the release of land from the Green Belt have been demonstrated.

6.3.2 We note that the Council comment that exceptional circumstances are met '*where the scale of unmet need balanced against the contribution a site makes to the function of the Green Belt weighs in favour of release*' (paragraph 6.38 of the Housing Topic Paper). In light of the evidence we have presented in our response to Matter 3, additional land should be released from the Green Belt within Wycombe District in response to the higher OAN which we consider should be planned for.

6.3.3 Furthermore, as set out above, there is a need for reserve sites to be identified so that housing needs continue to be met, in the event that delivery on allocated sites is delayed and/or safeguarded land to be identified to ensure the boundaries are capable of enduring beyond the end of the plan period.

**6.4 *What are the exceptional circumstances, as required by the NPPF paragraphs 79-86, that justify the Plan's proposed revision of the boundaries of the Green Belt?***

6.4.1 As set out in paragraph 6.3.1 above, exceptional circumstances, including the need for housing, justifying the release of land from the Green Belt have been demonstrated.

6.4.2 However, exceptional circumstances justifying the additional release of land at Princes Risborough from the Green Belt have also been demonstrated, particularly in light of the scale of unmet need arising within Wycombe District. As such, whilst the Plan's proposed revision is justified, additional Green Belt release would also be justified.

**6.5 *Do Policies DM43 (Replacement or extensions of dwellings in the Green Belt), DM42 (Managing Development in the Green Belt) and DM45 (Conversion of existing buildings in the Green Belt and other rural areas) provide an appropriate mechanism for managing the replacement, extension and conversion of buildings in the Green Belt?***

6.5.1 We have no comments.