

Wycombe Local Plan – Written Statement

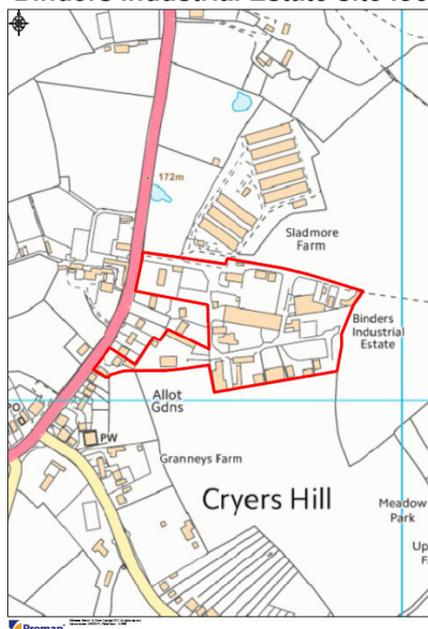
MATTER 6 - GREEN BELT SESSION

Respondent ID: 944

This Written Statement is submitted to the Wycombe Local Plan Examination. It has been prepared by GL Hearn on behalf of W.G. Binder Ltd, in respect of the Binders industrial Estate 'the site'.

Full site address is Binders Industrial Estate, Cryers Hill Road, Cryers Hill, High Wycombe, Bucks, HP15 6LJ. A redline plan is set out in Figure 1 below.

Figure 1. Binders Industrial Estate site location plan



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?

1. Are the Green Belt Assessments (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?
- b) Has the capacity of areas within settlement to accommodate growth been robustly assessed and what were the conclusions?
- c) How were the removal sites identified and assessed?
- d) Was an assessment undertaken of the contribution of each of the removal sites to the Green Belt purposes and what were the conclusions?

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?

Our response

In general, we do not consider that the Green Belt assessment work undertaken by the Council has fully taken account of previously developed land 'PDL' sites.

Such sites have not been fully identified, nor has their contribution towards Green Belt purposes, as well as other factors including sustainability of location, accessibility etc., been considered to make a

balanced judgement as to whether they could accommodate future development and be allocated for housing development in the Local Plan.

One such PDL site is Binders Industrial Estate. Our main concern is that the Green Belt assessment work does not make reference to this site. This is particularly worrying as the site was identified as a Major Developed Site under former Policy GB9.

Our concern is that the Part Two Green Belt assessment goes on to look at Parcel 25b in more detail and considers two locations at “Hoppers Farm” and “Land to rear of Spurlands End Road”, neither of which are PDL.

We therefore consider that the approach to the Green Belt assessment is not justified.

Our recommendation

We recommend that the Council fully assesses the site at Binders Industrial Estate as part of the Green Belt assessment.

3. Do the exceptional circumstances exist to justify the proposed revision of the Green Belt boundaries?

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?

Our response

We are concerned that the Council’s approach to exceptional circumstances (in GB1) does not make the best use of land.

There is no reference to PDL in the Council’s approach to exceptional circumstances (in GB1).

We also suggest that the Council’s approach to exceptional circumstances to only focus on tier 1-4 settlements is not justified because it rules out potential development at tier 5-6 settlements. We consider that all settlements have local needs and the Green Belt assessment / exceptional circumstances needs to consider this.

Our recommendation

We recommend that the Council fully assesses the site at Binders Industrial Estate as a potential new housing site allocation.

Further details are provided in our Local Plan Reg 19 representations (from November 2017), which include our Call for Sites submission form and we strongly recommend that the Inspector reviews this document in conjunction with this Written Statement. This document sets out the following:

- The site represents sustainable development.
- The site is previously developed land and therefore should be the focus for new development. It is an industrial estate wherein the principle of development and activity is well established.
- The site is deliverable – it is available for development, development is achievable on the site and the site is suitable for development.
- The site makes a limited or no contribution to the Green Belt purposes and the site has a very low level of openness.
- Redevelopment of the site could lead to a range of benefits for the local community relating to large vehicle movements, the environment, air quality and noise.
- Redevelopment of the site could provide around 100 to 180 new homes, including affordable housing.
- Some employment uses on the site could be retained if required.

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 the managing the replacement, extension and conversion of buildings in the Green Belt?

Our response

We have a major concern with the wording of Policy DM42.

This policy is unsound because it is not consistent with national policy, in particular NPPF Para 89:

A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- *buildings for agriculture and forestry;*
- *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
- *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*
- ***limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.***

In summary NPPF Para 89 states that exceptions to inappropriate development in the Green Belt include “***complete redevelopment of previously developed sites***” if there is no greater impact on openness or purposes.

Policy DM42 does not acknowledge this national policy approach at all in respect of previously developed land.

The current proposed policy wording would not allow for previously developed land in the Green Belt to be developed if there is no greater impact on openness or purposes.

Wycombe Council make it clear in the Local Plan consultation that brownfield sites are the priority for new development. Therefore, in light of NPPF Para 89 comments, the current policy wording of DM42, does not promote the plan’s adopted strategy to development to maximise development on previously developed land.

This is further exacerbated, by the Local Plan’s proposed amendment to delete Major Developed Site ‘MDS’ designations under former Policy GB9, which were previously attached to large developed / brownfield sites in the Green Belt. Notably the Binder Industrial Estate was previously recognised as an MDS. It is previously developed land in the Green Belt.

Overall DM42 is unsound because is not consistent with national policy. It is also unsound because it is not justified as there is no evidence to support this departure from the NPPF. As a result the Local Plan is also not positively prepared or effective.

Our recommendation

We recommend that the wording in Policy DM42 is changed to include recognition that “*complete redevelopment of previously developed sites*” is possible in practice if there is no greater impact on openness or purposes.