

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 the Issue: 'Do the exceptional circumstances exist to justify the proposed revision of the Green Belt boundaries....'

1 'Are the Green Belt Assessments (GB1 and GB2) soundly based, justified and consistent with national policy?'

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

d) 'Was an assessment undertaken of the contribution of each removal site 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?'

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

In relation to the above, I would draw your attention 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 as the Plan must be 'consistent with national policy' to be deemed 'soundly based', it should await the completion of the framework. The follow 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, considering your stated criteria and the present Government's clear views based upon the Ministry of Housing, Communities and Local Government's National Planning Policy Draft Framework, this planned development for HW9 should not proceed or at the very least should be delayed, to be reconsidered after the Government's final planning framework and before any action that would permanently damage the site.