

ADDITIONAL SUBMISSION IN SUPPORT OF NAPHILL & WALTER'S ASH RESIDENTS ASSOCIATION (NAWARA)'s REPRESENTATION BY PLANNING CONSULTANT NICK SHUTE OF 21 NOVEMBER 2017

CP8 PROTECTING THE GREEN BELT

Policy CP8 proposes “to remove limited areas of land from the Green Belt ... where there are exceptional circumstances for doing so”

The current National Policy requires that WDC alter Green Belt boundaries only in exceptional circumstances. However the definition of “exceptional circumstances” is not clearly defined – the revised NPPF Framework defines the exceptions as follows:

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

a) buildings for agriculture and forestry;

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with purposes of including land within it;

c) 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;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

e) limited infilling in villages;

NAWARA assumes that WDC are relying on **(e)** “limited infilling in villages” as the “exceptional circumstance” to justify removing GB protection from 5.58 acres of Chilterns AONB/GB agricultural land in Walter’s Ash (not Naphill).

In our earlier representation NAWARA highlighted that Naphill & Walters Ash are two separate villages with an historical boundary that runs down the centre of Clappins Lane. WDC refer to the villages of Naphill and Walter’s Ash as one single entity, no doubt to try and add weight to their proposal to allow “limited infilling in villages”.

This is no more valid as an argument than Eire and Northern Ireland being classed as one country because they share a common border or Islington and Hackney being classed as one borough for the same reason.

The two villages are separate entities and as such any further development as proposed would be “major infilling between villages” not “limited infilling in villages” - a quite different proposition and one which does not meet the requirements of an “exceptional circumstance”.

The 5.58 acre field off Clappins Lane is a valuable Green Belt site, helping to prevent the merger of settlements and safeguarding the countryside from encroachment

- The second Green Belt purpose is “ to prevent neighbouring towns merging into one another”

In the Local Plan WDC states that “the field is enclosed on three sides by housing” – that is a factual inaccuracy as the site is actually bounded by existing housing on only two sides (namely Allen Drive and Woodcock Avenue which are in Walter’s Ash) with the third boundary being mature hedgerow bordering Clappins Lane - the housing referred to on the third side actually being on the other side of Clappins Lane, well set back, in the next village of Naphill.

- The third Green Belt purpose is “to assist in safeguarding the countryside from encroachment”

The properties in Woodcock Avenue were originally built as part of the service personnel quarters for the RAF under an exemption that allowed building on Green Belt land. Were this exemption not in place then development of that area would almost certainly not have been allowed under the current AONB restrictions

The properties in Allen Drive and Battingswood Gardens were built in the early ‘60’s (with the first resident moving in during Feb 1964).

However, the Chilterns AONB was not established until 1965 - NAWARA believe that if the proposal to build Battingswood Gardens & Allen Drive had been submitted after 1965 it is highly likely that permission would have been refused and there would be a clear and extensive separation between the two villages.

The rural 5.58 acres of Chilterns AONB at the crest of Clappins field are now the last of that once extensive separation, so it is essential their GB status is retained and they continue to safeguard the Chilterns GB countryside from encroachment.

Failure to consider reasonable alternative sources of housing supply.

NAWARA has previously commented that WDC have failed to take into account in their Housing and Economic Land Assessment (HELAA) that the RAF have released previously empty properties in Woodcock Avenue into the general housing market in the last two years.

So far, 89 properties have been released (many of which stood empty for up to 10 years). They have been totally refurbished and marketed as new.

These are dwellings that were not available for housing of the general population previously and now they are – that has made a genuine and substantial contribution to both the available local and district housing stock.

There is a strong likelihood that the RAF will continue to release further empty properties (possibly as many as 200) into the general housing market as the over-supply increases due to the ongoing armed forces personnel reduction.

There is no evidence that the availability of former RAF housing has been considered as a source of future housing supply for the District.

Precedent

The recent decision by the Inspector regarding the Molins planning application, supported by the Secretary of State, included reference to Green Belt that we believe is relevant to the Local Plan.

The statement in the Report to the Secretary of State by the Inspector includes paragraph 29:

The appeal site has been an anomaly in the Chilterns countryside for many years, first as a munitions factory built to meet a national need, then as a substantial private factory complex. The legacy of those uses includes high levels of harm to a nationally-important countryside, to the openness of the Green Belt, and to the character of the area more generally. No one at the Inquiry doubts that something must happen to improve the situation.

This bears comparison with the situation in Walters Ash where substantial parts of the village have been developed by the Ministry of Defence on Green Belt/ANOB land that would not have been allowed under normal planning controls. Furthermore, in the Secretary of State's support of the Inspector's decision, his letter states:

The Framework notes that inappropriate development is, by definition, harmful to the Green Belt and substantial weight should be given to any harm to the Green Belt. The Secretary of State agrees with the Inspector that the number of dwellings in the scheme is significant and the proposal would introduce an urban character of built form (IR236). He also agrees that the visual impact of the development would impinge on the character and nature of the Green Belt significantly diminishing the quality of its openness, and that the significant peppering of light sources across the site would add to the change in the character and nature of the Green Belt (IR238-239). As such, for the reasons given in IR232-240, the Secretary of State agrees with the Inspector that the appeal proposal is inappropriate development in the Green Belt and should not be approved except in Very Special Circumstances (IR241).

The Molins site is 10.3 hectares or 25.45 acres and the application was for 212 houses, so 8.3 houses per acre. The RUR7 is for 64 houses on 2.26 ha, 5.58 acres, so 11.5 houses per acre. This surely means that the number of dwellings is even more 'significant' than the Molins Lane proposal and that the Secretary of State's points above in relation to Molins must surely set the precedent for the removal of RUR7 from the Wycombe District Council Local Plan.

Ian Hall, [REDACTED]
has been elected to attend the WDC Local Plan Hearing session on 26th July 2018
as Representative for Naphill & Walter's Ash Residents Association

29th June 2018