



WYCOMBE LOCAL PLAN EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTER 6 – GREEN BELT

ON BEHALF OF ENDURANCE ESTATES STRATEGIC LAND

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group

Suite 4 | Pioneer House | Vision Park | Histon | Cambridgeshire | CB24 9NL

T 01223 202100 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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1. INTRODUCTION

- 1.1 This Hearing Statement is prepared by Pegasus Group on behalf of Endurance Estates Strategic Land, which has development interests at land at Culverton Hill, Princes Risborough.
- 1.2 Endurance Estates has worked up proposals for development of the site having regard to the site-specific constraints and opportunities, and following discussion with the Area of Outstanding Natural Beauty (AONB) Board. These are explored more fully in the Regulation 19 representations which are available to the Inspector.
- 1.3 In summary, the current scheme provides for housing (both open market and affordable) located around the fringes of the site as informed by the landform of the site. It should be noted that the site is already enclosed by development on three sides. It will also provide for a substantial amount of public open space around the high point of the site and the south-eastern edge towards the Upper Icknield Way and the surrounding countryside, creating an appropriate transition with the wider AONB. This presents the opportunity to create a 'gateway' to the settlement. Appropriate landscape treatment is proposed to create new habitat for the Duke of Burgundy butterfly.
- 1.4 Whilst the Inspector has made clear that she does not intend to consider the merits of specific 'omission' sites through the Examination, Endurance Estates has concerns about the soundness of the wider Plan strategy insofar as it applies to Princes Risborough and considers that additional sites are required to provide flexibility in the Plan. Endurance Estates would welcome the opportunity to explore, with the Council, the potential of land at Culverton Hill to contribute to a more flexible Plan strategy.

2. MATTER 6 – GREEN BELT

Q1: Are the Green Belt Assessments (GB1 and GB2) soundly based, justified and consistent with national policy?

- 2.1 The Green Belt Assessment Part 2 (GBA) provides an assessment of individual development sites; this approach is welcome as it allows for a proper understanding of the Green Belt implications of each site.

- 2.2 However, we are concerned that the findings of the Green Belt Assessment have not been informed by emerging development proposals, meaning that the findings are based upon a 'worst case scenario' which assumes the sites will be developed in full. In practice, schemes in Green Belt and AONB locations are likely to have been subject to a 'landscape led' approach in order to understand their realistic site capacity. As such, the GBA's conclusions are not justified.
- 2.3 In the case of land at Culverton Hill (SPR 0087) the GBR concludes that the site performs a weak role in terms of the Green Belt functions, with the exception of safeguarding the countryside from encroachment, for which the site scores strongly. The reasoning given for this is:
- "Parcel is entirely absent of built form and is currently in use as open countryside. Site has very long distant views into the Chilterns AONB and feels part of the countryside. Parcel has a strong, unspoilt rural character"*
- 2.4 Clearly, development of the site in its entirety will affect the character of the site significantly. However, Endurance Estates' proposals envisage a much-reduced developable area (informed by the 'visual envelope' of the site) and a significant amount of public open space at the interface with the open countryside and the wider AONB.
- 2.5 Furthermore, in respect of the AONB, the GBA concludes that the site would form 'major development'. As set out in our response to Matter 2 Question 3, the definition of 'major development' is based upon a range of site-specific factors. However, the GBA takes the simple assumption that the site is so large that it is considered 'major development' and does not consider in any meaningful detail whether there are exceptional circumstances under paragraph 116 of the Framework.
- 2.6 It is considered that the GBA should take into account developers' proposals for development within the assessed sites in order to gain a fuller understanding of the capacity of the sites within the District. This will help to ascertain the extent to which these could contribute towards a more flexible land supply.

Q3: Do the exceptional circumstances exist to justify the proposed revision of the Green Belt?

Q4: What are the exceptional circumstances as required by the NPPF paragraphs 79 – 86, that justify the Plan’s proposed revision of the Green Belt?

- 2.7 It is appropriate to answer these questions together. There is a significant housing need in Wycombe District and the extent of Green Belt and AONB designations across the District means there are few opportunities to meet this need outside of Green Belt land – particularly as the most sustainable locations are generally surrounded by Green Belt. In order to deliver development in the most sustainable locations and in the most sustainable way, it is necessary to consider development within the Green Belt and therefore exceptional circumstances do exist to justify the revision of the Green Belt boundaries.