

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION

STAGE 1 – MATTER 6 – GREEN BELT

ON BEHALF OF BOVIS HOMES LIMITED

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1. Introduction

- 1.1 This Statement is submitted on behalf of Bovis Homes Limited, in response to the Inspector's Questions relating to Matter 6 (Green Belt).
- 1.2 Bovis Homes Limited have control over one of the allocated housing sites (HW 11) within the submitted Local Plan. The site currently lies within the Green Belt, and is proposed to be removed from it by the Local Plan.

2. Matter 6 – Green Belt Session

- 2.1 Responses to the specific questions raised by the Inspector are provided under the associated questions below, all of which relate to the overarching issue summarised by the Inspector as follows;

'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'

Q.1 Are the GB Assessments (GB1 and GB2) soundly based, justified and consistent with national policy?

- 2.2 Whilst there is no clear national guidance with regards how to undertake a Green Belt Assessment, it is now common place for authorities to undertake a two stage process. The initial stage being a strategic assessment of larger parcels of land against the Green Belt purposes set out in the NPPF, followed by more detailed site specific considerations. Wycombe have followed such an approach with a Part 1 Assessment, undertaken by Arup, and a Part 2 Assessment undertaken by the Council, with a critical review by Arup. The critical review concluded that the Council's approach was 'broadly logical, robust, and aligned with national policy'. Amendments were made in response to the critical review, prior to publication.
- 2.3 A two-stage assessment can sometimes result in smaller parcels, which by themselves might represent an appropriate release from the Green Belt, not being given proper consideration through the assessment process due to their location being within a larger parcel that in the Part 1 strategic stage assessment has been found to perform well against the purposes, and hence isn't assessed to any further extent. However, the Council have ensured that isn't the case with their approach, because the Part 2 Assessment considers sites beyond those that are identified as lying within weak performing larger parcels in the Part 1 Assessment.
- 2.4 Such an approach is consistent with national policy for two primary reasons. Firstly, the NPPF when advising on the purposes of the Green Belt at paragraph 80, makes no reference to any priority being given to wider strategic intentions, rather than more localised implications. Secondly, the NPPF makes it clear that there are other considerations to take account of when reviewing Green Belt boundaries in addition to the purposes. Most notably paragraph 84 refers to the

importance of promoting sustainable patterns of development when reviewing boundaries, whilst paragraph 85 sets out a list of criteria for authorities when defining new boundaries, which includes the requirement to;

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development*
- *Not include land which it is unnecessary to keep permanently open*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.*

2.5 As a result, it is apparent that national policy requires a far greater consideration of matters than simply how well a parcel performs against the defined Green Belt purposes, when decisions are being made on how to review and define Green Belt boundaries as part of the Local Plan process.

Q.1 (a) Can the need for housing and employment development be accommodated on deliverable sites within settlement without releasing land from the Green Belt?

Q.1 (b) Has the capacity of areas within settlement to accommodate growth been robustly assessed and what were the conclusions?

2.6 The Council have undertaken more than one 'call for sites' during the LP process, which have contributed to a Housing & Economic Land Availability Assessment (HELAA) publication by the Council in Sep 2017, which sets out the availability of housing and employment sites across the plan period. Table 24 of the HELAA identifies the sources of the housing supply over the Plan period, which identifies that approximately half of the housing numbers that are to be delivered over the plan period are from previously developed sites in urban and rural areas. The Council will provide further evidence on how such assessments of capacity have been made, but given that approximately half of the Council's housing requirement will need to be delivered from green field sites, outside of the urban areas, it is quite clear that there is no possibility of the Council's housing and employment growth being provided only within settlements. Even if higher densities or additional windfall sites, beyond those assumed by the Council, are

allowed for, there is still a requirement to provide in the region of 5,000 houses on green field sites beyond existing settlement boundaries.

- 2.7 It is therefore strongly considered that the need for housing and economic growth cannot be accommodated on deliverable sites within settlements without releasing land from the Green Belt. The Council will provide further evidence on their own assessment with regards the capacity of previously developed sites.

Q.1 (c) How were the removal sites identified and assessed?

Q.1 (d) Was an assessment undertaken of the contribution of each of the removal sites to the Green Belt purposes and what were the conclusions?

- 2.8 The Part 2 Green Belt Assessment considered potential removal sites from the following sources;

- Areas identified in the Part 1 Assessment that did not fulfil the purposes of the Green Belt.
- Sites identified at a more local level; and
- Sites proposed as a result of call for sites and consultations on different stages of the Local Plan.

- 2.9 As a result, careful consideration was given to ensure that all potential options for removal were explored.

- 2.10 The Part 1 Green Belt Assessment considered how the larger parcels adhered to the Green Belt purposes. Significantly, the Part 2 Assessment, undertaken by the Council and informed by Arup's comments, also included an assessment of how the individual removal sites performed against the Green Belt purposes.

- 2.11 The conclusions on all of the removal sites are included at Appendix GB1 of the Part 2 Assessment. With regards to Clay Lane, Booker (HW 11), the Part 2 Assessment concluded that the 'parcel scores relatively weakly against NPPF purposes', which contributed to the subsequent decision, and justification, to remove the site, alongside others nearby, from the Green Belt.

Q.2 – Is the approach to amending Green Belt boundaries to release development soundly based and is it consistent with the conclusions of the review in respect of their contribution to Green Belt purposes?

- 2.12 If assessing the proposed removal sites simply against the findings of the Part 1 Green Belt Assessment, then there is some inconsistency, in that some of the removal sites are located within strategic parcels identified as performing strongly against the purposes. However, given the strategic scale of the larger parcels assessed within Part 1, it was correctly recognised by the Council that there will be the opportunity for some smaller sites within some of the stronger performing strategic parcels, to be allocated without detracting from those purposes.
- 2.13 This has been the case with land at Clay Lane, Booker, which fell within Parcel 43 (c) of the Part 1 Assessment which at a strategic level was defined as performing strongly against the purposes. However, when considered at a detailed level within the Part 2 Assessment, it was found to score relatively weakly against the purposes. As a result, the subsequent allocation of the site, alongside adjacent areas being removed from the Green Belt, is consistent with the conclusions of the Part 2 Assessment.
- 2.14 It must also be noted that adherence or otherwise with the purposes is not the only consideration when reviewing Green Belt boundaries, as referred to at 2.4 – 2.5 above.

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

- 2.15 Yes. For reasons explained below.

Q.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?

- 2.16 It is considered appropriate to respond to this question at both a strategic and local level.

- 2.17 In strategic terms, the Local Plan Evidence Base has demonstrated that without development taking place within the Green Belt, the Council will fall significantly short of its OAN housing requirement for the Plan period. Considerable efforts have been made through the 'Call for Sites' and subsequent HELAA documents in an attempt to identify appropriate sites for housing and employment, without needing to remove land from the Green Belt. However, not only has this failed to identify sufficient non-Green Belt sites, but it has failed by a substantial amount.
- 2.18 AVDC have agreed to take 1,700 dwellings of the Council's OAN, but all efforts should be made to enable the Council to provide for its own housing requirements, in order to help provide for the local settlements and communities that will benefit from the growth. With this in mind the Green Belt Assessments have identified land for release from the Green Belt that would not compromise the purposes of the Green Belt, whilst also ensuring that other elements of national policy on the issue of Green Belt review, including the promotion of sustainable patterns of development, will be adhered with.
- 2.19 If development levels are constrained simply because of the principle of not developing in the Green Belt, the current housing crisis will deepen in Wycombe District, in direct conflict with one of the main underlying intentions of national policy. In addition to a reduction in needed market homes in locations to support the economic growth of the area, such constraint would also deepen the shortage of affordable housing. Additional commuting would be likely to result, as fewer people are able to live near their place of work, with a subsequent adverse impact on the highway network and pollution.
- 2.20 The Council have made the right decision to review their Green Belt boundary, in order to properly investigate the potential for Green Belt land to contribute towards their housing requirement. Such review has identified sites that can come forward and adhere with the requirements of national policy relating to the drawing up of Green Belt boundaries, including the intention of promoting sustainable development. As a result, the need to address the Council's housing requirements, and ability to do so without detracting notably from the Green Belt purposes and adhere with other relevant national policy on the matter, is considered to represent the exceptional circumstances to justify Green Belt boundary amendments, and allocation of some associated sites accordingly.

- 2.21 Turning to the local angle of whether exceptional circumstances are present, land at HW11 has been confirmed within the Part 2 Green Belt Assessment to perform relatively weakly against the Green Belt purposes. This is entirely understandable, when assessed against the 4 purposes for consideration, referred to below;
- To check the unrestricted sprawl of large built-up areas
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
- 2.22 When assessed against the 1st, 2nd and 4th of the above points, the site cannot be considered to contribute at all to these purposes. With regards the 3rd purpose, interpretations of encroachment can vary. It is recognised that development will be introduced to a currently undeveloped site, so to that extent encroachment in the countryside might be considered to take place. However, the site itself directly adjoins an established cluster of development, so a case could be made that development is already present, and the allocation will result in no discernible difference in terms of the level of encroachment of development in the countryside.
- 2.23 As a result, allocation HW 11 is understandably considered to score poorly against the purposes set out in the NPPF.
- 2.24 The site is considered to be in adherence with the wider spatial strategy, which encourages sustainable development, through the allocation of development in close proximity to established / allocated facilities and services. The site lies directly opposite Wycombe Air Park, which is to be allocated for a considerable Employment designation in the Local Plan, so will be within walking distance of major employment opportunities. The site is also linked through pavement and public transport to High Wycombe. There are a number of bus services that currently operate, serving the site from a bus stop adjacent to it, and the frequency of these services is likely to improve with the significant employment allocation opposite. The site lies within a 20 minute walking distance of a variety of retail facilities (John Lewis, Asda, Tesco), community facilities (Booker Memorial Hall, Cressex Community Centre & Social Club) and education in the

form of Cressex Community School. In addition to providing existing and potential employment opportunities directly opposite the site, the Air Park also provides for leisure facilities such as the Wycombe Squash & Racketball Club.

- 2.25 As a result, in addition to the site scoring weakly against the Green Belt purposes, its allocation will adhere with national policy on reviewing Green Belt boundaries through the allocation of a site that will represent a sustainable development and assist with the Council's overall strategy for meeting their housing requirements in a sustainable manner.
- 2.26 Allocation HW 11 is therefore considered to demonstrate the local level exceptional circumstances required by national policy, and when combined with the strategic level exceptional circumstances referred to above, the site's recommended removal from the Green Belt for housing, is considered to adhere with national policy regarding the revision of Green Belt boundaries.