

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION

MATTER 6 - GREEN BELT

MR L NOE - ID REF. 0979

Additional statement responding to the Inspector's Schedule of Matters, Issues and Questions. These representations do not repeat matters set out in previous representations on behalf of Mr Noe, and do not seek to respond to every question raised in the Inspector's Schedule. The matters set out below focus on particular issues which the representor considers to be important in relation to assessing the soundness of the Plan.

Q1. 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 settlements without releasing land from the Green Belt?

b) Has the capacity of areas within settlements 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?

1. The housing and economic land supply evidence base (HELS documents) is both robust and comprehensive. The September 2017 HELLA (HELS1) identifies capacity for 5,611 dwellings from previously developed land (including rural areas) which equates to approximately 42% of the OAN of 13,200 dwellings over the Plan period.

2. The methodology for the HELLA included a robust approach to the capacity (density) of sites which considered sites on a net density basis factoring in constraints (e.g. landscape, biodiversity, flood risk) that would impact on the developable area. The average site density for PDL in the Tier1 settlement was 136 dph and 96 dph in Tier 2 settlements. The corresponding densities in Tiers 3-6 incl. ranged between 32 and 42 dph although these would typically relate to smaller sites. Tier 1 and Tier 2 densities, from where most of the PDL supply would come, are considered to be realistic. The scope for any additional capacity here is, therefore, limited and in any event, there is no realistic evidence to support any suggestion that such additional capacity would bridge the significant existing gap between capacity and need.

3. The Council (WDC) has acknowledged that development needs cannot be met without releasing land from the green belt having undertaken a HELLA as part of the evidence base.

4. WDC has produced a robust Evidence Base in support of the proposed allocations. In relation to a landscape, visual and green belt perspective this includes:

- Green Belt Stage 1 Assessment - Arup, March 2016;
- Green Belt Stage 2 Assessment – Arup, September 2017 (which was developed from an earlier draft issue in 2016);

- Wycombe District Landscape Character Assessment – LUC 2011;
- Urban Design Assessment Development Capacity, AONB and GB sites – WDC, September 2017; and
- WDC Topic Paper 7: Natural Environment, October 2017.

5. As set out above, WDC has undertaken a Green Belt Assessment, which was carried out in 2 stages. We concur with both the overall approach and findings of the study.

WDC Green Belt Stage 1

6. Stage 1 of the WDC Green Belt Assessment (prepared by Arup) was published in March 2016. It was carried out using a methodology agreed upon by four District Councils: Aylesbury Vale, Chiltern, South Bucks as well as WDC.

7. The Buckinghamshire Authorities Green Belt Assessment March 2016 forms Stage 1 of the Council's Green Belt Assessment. It assessed strategic land parcels - General Areas - against the purposes of the Green Belt as defined in the NPPF. Within the General Areas, it also identified several sub-areas that performed more weakly and some medium and strongly scoring areas. Some of these sub-areas were identified for further consideration.

8. The guidance in Arup's Part 1 Assessment was made in relation to four of the Green Belt purposes defined in the NPPF. However, Purpose 5 of the NPPF (to assist in urban regeneration by encouraging the recycling of derelict and other urban land) was excluded from the assessment. The reason for this decision was stated as,

“the advice note issued by PAS suggests that the amount of land within urban areas that could be developed will have already been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against this purpose will not enable a distinction between General Areas as all Green Belt achieves the purpose to the same extent... Furthermore, during engagement with the Steering Group, we discussed whether any planned urban regeneration schemes were being inhibited by Green Belt designations, but no areas were identified by the Steering Group or stakeholders.” (Buckinghamshire Green Belt Assessment, Report: Methodology and Assessment of General Areas, p.66 paras 4.4.29 and 4.30)

9. In relation to the Jacksons Field part of Policy BE2 (compared with the wider area WDC considered at stage 1), it comprises a small area in the northern portion of a sub-area identified as RSA-19 within General Area 58a. This sub-area was carried forward into the WDC Part 2 Assessment for further review and consideration.

10. RSA-19 was assessed as having an overall score of 'medium' contribution to Green Belt purposes. The assessment stated that,

“RSA-19 is almost completely enveloped by built form as a result of extensive ribbon development on Hedsor Road, which although washed over in the Green Belt, has an

urban character and is functionally linked to Bourne End / Wooburn. While the sub-area is largely open, the influence of built-form reduces its sense of rurality."(Buckinghamshire Authorities Green Belt Assessment, Methodology and Assessment of General Areas, para. 6.4.45).

11. Hedsor Road lies approximately 0.5km south of the Site and, therefore, does not form one of the site boundaries. However, Jacksons Field is contained on three sides by urban development along Princes Road, Cores End Road and Hawks' Hill. When considered in relation to the whole of the proposed allocation (BE2) the site would be fully bounded on all of its sides, when taking into consideration the whole of the wider sub-parcel.

WDC Green Belt Stage 2

12. The 'Draft' Part 2 Green Belt Site Assessment was initially released in June 2016. It correctly took forward 'general areas' and 'sub-parcel areas' that had been identified in Part 1, as warranting further consideration for potential removal from the Green Belt, plus smaller land parcels which had been suggested to WDC for development and a series of 'wider sense checks' sites identified by WDC. This assessment is based on parcels of a finer grain.

13. The 2017 methodology provided a series of 4 clear and logical steps which we agree with (page 19 of the Part 2 Green Belt Assessment). In summary, the steps are:

Step 1: Is the location capable of contributing to sustainable development?

14. Bourne End/Wooburn is a Tier 2 settlement that is demonstrably sustainable. Development in this area has direct access to a wide range of facilities and services all supported by good accessibility (see representor Matter 2 Statement for further details).

Step 2: Is the site capable of removal from the GB?

15. **Reviewing NPPF Green Belt Purposes – How strongly does the site contribute to the purposes of including land in the GB?** This step correctly reviewed sites identified earlier in the Buckinghamshire Part 1 GB Assessment against the five NPPF Green Belt Purposes. The overall scoring criteria used (taken from Arup Part 1) are sensible and logical, based on a sliding scale from 0-5, where 0 = does not meet purpose, 5 = meets purpose strongly (ref WDC p.23-24 Part 2 Assessment).

16. We consider that WDC correctly applies scores of between 0 and 2 in relation to the contribution of BE2 to the Green Belt purposes, where: "does not meet purpose (0), meets purpose weakly (1) or meets purpose relatively weakly (2)".

17. **General Extent – whether the site is capable of removal from the Green Belt?** We endorse the approach WDC has taken to remove sites that “would result in a rational built up area, contiguous with an existing non-GB area”. This approach is based on a logical focus to consider how specific GB issues (identified in the NPPF) should be taken into account:

- i) The contribution a site makes to the aims and purposes of including land in the Green Belt
- ii) Creation of rational built up areas which are consistent with the general extent of the Green Belt.
- iii) Need for enduring boundaries based on permanent physical features such as roads, rivers, woodland belts.

18. **Boundaries – Would the new GB boundary be permanent, robust, based on enduring natural or other features?** We concur with the approach taken by WDC, that boundaries are “*as exists – or suitable boundaries can be secured with limited mitigation*”.

Step 3: Is the site otherwise developable?

19. **HELLA Site Assessment:** WDC is correct to apply the test of a site as being deliverable as set out in the HELLA methodology. Sites must be suitable, available and deliverable.

20. WDC correctly identifies that a site assessment (para 2.27. p.27) should include an initial planning assessment of suitability – it correctly includes the elements of landscape and visual appraisal that one would expect to find – landscape assessment, designations, rights of way, topography, features, views in and out, and an appraisal including capacity, but also commenting on parts/compartments of a site that may have more (or less) capacity to accommodate development. WDC has produced a standard proforma (e.g. Appendix GB1 in evidence base) that details the assessment undertaken.

21. WDC correctly refers to the significant constraint posed by the AONB (WDC’s Topic Paper 7). The Natural Environment records that over 70% of the District lies in the Chilterns AONB. The Council’s assessment (WDC AONB Site Assessment) evidence for sites in the AONB concludes that allocations which would result in ‘major development in the AONB’ and therefore conflict with the NPPF should not, therefore, be included (p2.28p.27 Green Belt report). We concur with this approach which ensures development is focussed on less sensitive, more suitable sites outside the AONB and we consider that the separate evidence base in this regard is welcomed. Although a matter for detailed consideration later in the Examination, it is evident that Jacksons Field and the rest of the BE2 allocation is correctly allocated by WDC, as it is sited in a sustainable location, has

few constraints and meets the tests of the Green Belt Assessment and Site Assessment process relating to the Natural Environment.

Step 4: Identify whether there are exceptional circumstances for the site to be removed from the Green Belt.

22. Exceptional Circumstances: We concur with the approach of WDC that in successfully passing Steps 1-3 (above) the test of exceptional circumstances is passed in respect of the scale of unmet need balanced against the contribution a site makes to the function of Green Belt. This weighs in favour of release (paras. 2.31, p.28). In the context of the objective of achieving sustainable development, the Council has considered the AONB, and the importance of ensuring the Green Belt endures and continues its strategic function to increase the supply of housing to meet local needs.

Issues raised on Policy BE2 by objectors, in particular ID 1347 - Pegasus Group on behalf of Keep Bourne End Green.

23. We note that there is unjustified criticism of WDC at 2.4 p.3 of the Pegasus report, where it is claimed the assessment was "undefined" with "no definition for each GB Purpose". The assessment was properly defined and carried out and clearly forms part of the Evidence Base in Appendix GB1 Individual Site Assessments, where each green belt purpose is assessed. Further, the methodology and scoring mechanism is clearly set out in the September 2017 Stage 2 report.

24. We also take issue with the claim regarding "inadequate evidence base" in Section 1 of the KBEG representations. The evidence base on Environmental Issues (Green Belt, Landscape, AONB and Heritage) is sound, complete and up to date and underpinned by Topic Paper 7: Natural Environment.

25. We note there is a claim of failure to identify "likely Significant Effects on the environment". However, we disagree since the evidence base demonstrates that WDC (see Topic Paper 7: The Natural Environment) has indeed identified and had regard to likely effects on the environment. For example, it has carried out detailed assessments of sites in the AONB protected landscape. The Step 3 process discussed above (part of WDCs Stage 2 Green Belt work) also included specific site assessment work.

26. Although a matter for detailed consideration later in the Examination, it is relevant in terms of the overall Pegasus representations to identify some specific areas where we take issue with their assessment of Green Belt purposes in relation to Policy BE2 (their paragraph 2.21 reps). For example:

27. Purpose 1: Pegasus claim that (development of) the parcel would fail to check the southern/eastern spread of Bourne End. However, Appendix GB1 (WDC) plainly shows the settlement to extend much further south and east which would lead to no additional spread, if Policy BE2 were released and developed.

28. Purpose 2: Pegasus claim that two towns would merge as a result. However, Hawks Hill is not a "town" in its own right – it is a built-up area that is effectively part of Bourne End and forms a contiguous settlement boundary.

29. Purpose 3: Pegasus and their consultants make frequent reference to “Green Belt land”, “quality of land”, “amenity asset” and “views” from footpaths crossing the proposed allocation. However, in the context of assisting in safeguarding of the countryside from encroachment (purpose 3), it is openness that is the most important consideration. The focus should not be on the countryside characteristics of a site, but how that site contributes to the wider countryside of which it is a constituent part. The extent of that countryside is determined by topography, woodland and major physical features, including development that closes off views. It is evident that the wider extent of the countryside in relation to BE2 is limited/enclosed by such features, such that there would be a limited effect on openness (in both spatial and visual terms).

30. Purpose 4: The response by Pegasus that this is a "local conservation area" shows they are aware it does not relate to the special character of a historic town core. Whilst the local issue has relevance in terms of a detailed approach for a planning application (post allocation) it should take into account the updated Conservation Area Appraisal and as noted in Appendix GB1. These issues can be addressed by layout, but it is wrong for Pegasus to assume that it would be simply "a narrow tree belt".

31. To conclude on Q1, the Green Belt Assessments (GB1 and GB2) are soundly based, justified and consistent with national policy. The need for housing and employment development cannot be accommodated on deliverable sites within settlements without releasing land from the Green Belt. The capacity of areas within settlements to accommodate growth has been robustly assessed and the conclusions reached by the Council are sound and justified. The removal sites have been properly identified and assessed, including a detailed assessment of the contribution of each of the removal sites to the Green Belt purposes. The Council’s approach and conclusions are sound.

Q2. 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?

32. As highlighted in Q1 above relating to the methodology and assessment work undertaken by Arup, we fully endorse the approach by WDC to Green Belt by carrying out a 2-stage assessment of Green Belt functions. The approach of WDC is clear, robust and transparent. This has led to a logical and clear conclusion in respect of sites to be released from the Green Belt. The technical appendix to the original representations in respect of Green Belt, landscape and visual issues show a similar outcome (for Jacksons Field – part of allocation site BE2) to that of the Council.

33. As an example, WDC's Map 8 accompanying the Plan clearly identifies how the outcome of the work undertaken has led to a clear strategy for sustainable development in Bourne End and Wooburn. It has resulted in a carefully considered amended Green Belt boundary that is logical, durable, and defensible (permanent) in the long term. It also takes into account (for example through other studies such as the AONB study) the constraints associated with other land in the District.

Q3. Do the exceptional circumstances exist to justify the proposed revision of the Green Belt boundaries?;

and

Q4 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?

34. We concur with the approach and conclusion of WDC that the exceptional circumstances for Green Belt release in the District is founded on the overwhelming need to provide more housing in sustainable locations as set out in the NPPF. Each green belt release site was considered in terms of how it will help meet the acknowledged need for new housing as well as an assessment against the Green Belt purposes of those sites. This goes to the heart of the aims of WDC which are borne out in Topic Paper 7: The Natural Environment. This is being "...focussed on the core planning and sustainability objective of conserving and enhancing the natural environment" (para. 5.1 p 20) but in the context of providing sustainable development to meet the needs of the District, in accordance with the spatial strategy of the Plan.

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