



## Matter 6 Green Belt

[Representor ID Reference: 600]

***Issue: 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?***

**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 settlement without releasing land from the Green Belt?**

**b) Has the capacity of areas within settlement 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?**

1.1 RARA does not believe the Green Belt assessments are soundly based, justified or consistent with national policies. Whilst RARA accepts that some Green Belt land may have to be released for development, there is an urgent need for a more comprehensive Green Belt review to identify those sites than has been carried out to date.

1.2 That urgently required review must take account of the need for sustainable development. Sustainability is the “Golden Thread” which should run through our planning system (NPPF, paragraph 14). The latest consultation document on the current review of the NPPF (March 2018 – page 8) also notes that “the presumption in favour of sustainable development remains at the heart of the Framework”.

1.3 However, the Green Belt assessments carried out to date, and proposals for development in some of the existing Green Belt, take scant recognition of the need for sustainable development. For example, we should be matching new homes with job opportunities, negating the need for long commutes. The Plan ignores this. Our focus is on Princes Risborough, where it has been recognised that there is little scope for creating employment.

1.4 RARA highlights below some examples of where the Plan has taken little recognition of sustainability with regard to Green Belt:

- (1) The proposed development behind Poppy Road, which is in Green Belt (and adjacent to the AONB), impacts on the Pyrtle Spring a chalk headwater and, as such, a UK Biodiversity Action Plan (BAP) priority habitat. Environment issues and challenges in gaining access to this area are considerable.

- (2) The relief road and further access road are both in Green Belt and AONB and would constitute major development which would be subject to further public interest tests under the NPPF for up to 58 new homes (we suspect this area will not be able to accommodate this number). This area should not be taken out of Green Belt.
  - (3) The Green Belt Assessment Part 2 (July 2016) notes that the Culverton field (the site of the proposed relief road) has very long distance landscape views, and is well connected to the wider countryside. The site has a strong, unspoilt rural character and because of “its visual exposure in short- and long-distance views, and its contribution to the amenity of the AONB and a National Trail, the site has a very low capacity for development.” In addition visual intrusion caused by the introduction of new transport corridors and associated loss of tranquillity through the introduction of lighting, noise and traffic movement can only have a negative impact. And yet, WDC are planning on driving a major relief road through this Green Belt – and potentially opening it up for further development.
- 1.5 We recognise that in some locations, the original designation of Green Belt status is no longer appropriate to current needs. There is a requirement for a comprehensive Green Belt review, but one that is aligned with the NPPF and, in due course, the updated NPPF, expected later this year.
- 1.6 To meet these concerns and to make the Plan sound, modifications are required:
- (1) Alongside reducing the allocation to Princes Risborough and the proposed relief road, an immediate review of the adopted Plan will be required (see Matters 2 and 3), enabling a more comprehensive Green Belt study to be undertaken, aligned to sustainable development. We consider from the evidence produced to date that there are appropriate locations across the district that could support sustainable development.
  - (2) Remove the proposal to build 58 new homes on the Poppy Road site, protecting this valuable habitat whilst negating the need for a major new road development through the adjacent Green Belt, AONB and valuable farm land.
  - (3) Focus first on brownfield sites – there are potential sites in Princes Risborough, including on New Road and through the possible relocation of existing businesses (such as Blanchfords) to more appropriate, commercial / industrial park locations (see Matter 5).
- 1.7 Put shortly, RARA accepts the need for new homes and considers a number in the order of 1,000 for Princes Risborough, which would represent some 30% growth, could be delivered in a sustainable way and without the immediate need for the proposed relief road. A more strategic long term infrastructure solution can then be developed through time. In the short term, infrastructure solutions can be gained through more imaginative “smart” solutions as identified in our Representation submission, “Representation on the Publication Version of the Wycombe District Local Plan”, at section 4.3.20.

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

- 3.1 RARA agrees that exceptional circumstances do exist to justify revision of the Green Belt boundaries, but does not agree to the current proposed boundary changes. As noted in our response to Question 1, a more comprehensive review is required, aligned to the NPPF requirement for sustainable development.