



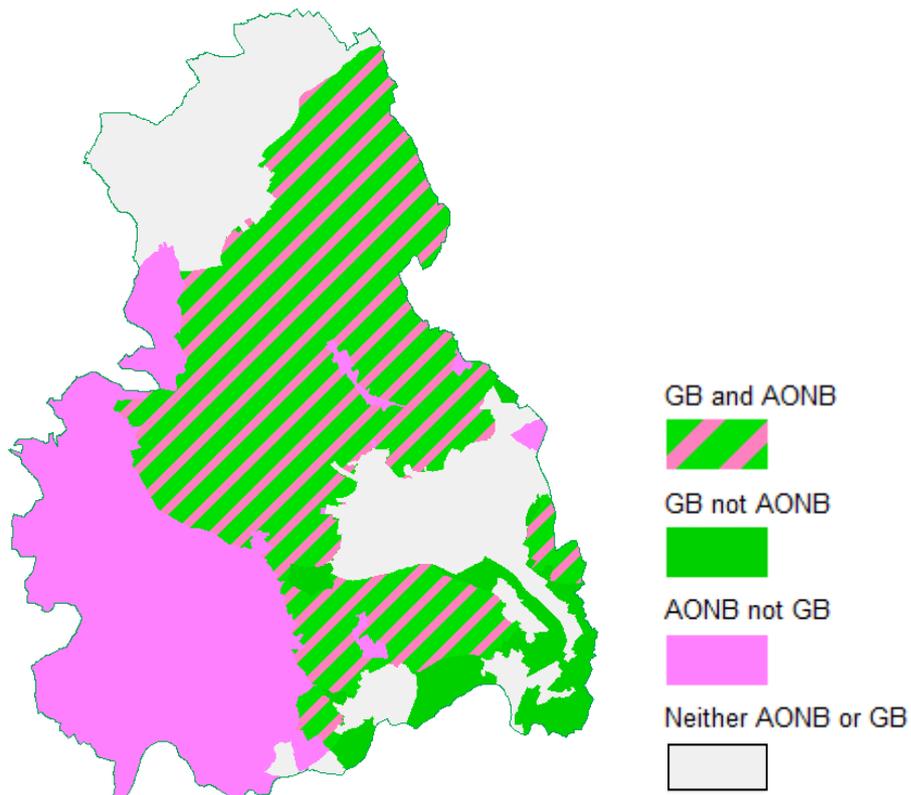
Wycombe District Local Plan Examination

Matter 6: Green Belt

June 2018

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

1.1 The figure below shows the general distribution of existing Green Belt in the District, together with the Chilterns AONB for context, and the extent of overlap. This sets the overall context for the conclusion that a Green Belt assessment was necessary and appropriate in order to help address the development needs of the District.¹



Category	Area (HA)	%
AONB and GB	13,942	43%
GB not AONB	1,706	5%
All GB	15,648	48%
AONB not GB	9,205	28%
AONB and/or GB	24,853	77%
Neither AONB or GB	7,601	23%
Total Wycombe District	32,453	100%

¹ As detailed in Section 6 TP2 Topic Paper 2 Housing and Section 5 TP3 Topic Paper 3 Economic Development

- 1.2 The decision to review the Green Belt, the method adopted, and its application to individual sites, were all subject to significant representations at regulation 19 stage. This included inter alia the same question as we are considering now. The Council's initial response to these issues is set out at pages 100 to 104 of WDLP10 Statement of Consultation.
- 1.3 The starting point for any review of existing Green Belt is NPPF paragraph 83. In essence, the presumption is that current Green Belt should remain as Green Belt in the future, unless there are exceptional circumstances to amend this.² National policy and guidance does not prescribe a method or process for this assessment.³ For that reason, a great deal of time and effort was spent developing a sound methodology for the assessment with the other Buckinghamshire authorities and consultants Arup.
- 1.4 The core methodology is set out at 2.4 of GB1 Green Belt Part Two Assessment. In summary, this says that exceptional circumstances will only exist when all four of the following conditions are met:
- The location is capable of contributing to sustainable development (NPPF paragraph 84);
 - The site is capable of removal from the Green Belt, having regard to the purposes of including land in the Green Belt and the need for enduring boundaries (NPPF paragraphs 80 and 85);
 - The site is otherwise deliverable or developable (NPPF paragraph 47); and
 - The OAN is not being met from other sources of supply and the scale of unmet need balanced against the contribution a site makes to the quality and function of the Green Belt weighs in favour of release.

² Relevant national policy and guidance is reviewed more fully in section 2 of GB2 Buckinghamshire Green Belt Assessment - Report Methodology and Assessment of General Areas and paragraphs 1.13-1.16 of GB1 Green Belt Part Two Assessment.

³ Paragraph 2.1.12 of GB2 Green Belt Part Two Assessment

- 1.5 The Council believes this approach accords with national policy, as the approach seeks overall to balance the competing policy objectives to meet OAN and to give great weight to protecting the Green Belt, whilst also promoting sustainable patterns of development.

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

- 1.6 There is still a shortfall of housing and employment development needs even with the release of Green Belt sites as the OAN for the district cannot be met in full. Historically the delivery of PDL sites has been high, however the availability of these sites has now reduced, whilst the need for development has increased. This has meant less land is available within settlements and alternative green field options have been considered, including releasing land from the Green Belt. Those sites that are available within settlements are often constrained, making delivery challenging.
- 1.7 The Green Belt Part 2 Assessment (GB1) identified there are exceptional circumstances for the release of ten Green Belt sites for housing and/or economic development, providing a capacity for 1,139 dwellings. This makes up 10.4% of the housing target. Without the release of these Green Belt sites the unmet housing need would increase from 2,275 to 3,414, equivalent to 25.9% of the OAN and for employment sites without Green Belt release the shortfall of employment land against the forecast demand would increase from 10 hectares to approximately 29 hectares.
- 1.8 Table 4 of the HELAA sets out the sources of sites assessed for housing and employment, with paragraphs 17 - 33 setting out the different options considered to meet development needs. These options include identifying scope for development in the Area of Outstanding Natural Beauty for 'Main Villages' at Lane End and Stokenchurch; identifying scope for development in 'Main Villages' outside the AONB for Great and Little Kimble and Longwick villages;

reviewing extent of Princes Risborough Expansion Area; reviewing developable areas on the former 'reserve' sites; review of site densities for all sites; reviewing employment land for release to housing; reviewing publicly owned land for release for housing; review of empty homes and housing estates for regeneration and review of windfall assumptions.

- 1.9 All of these options went through a secondary review process following the Draft Plan consultation in response to Aylesbury Vale's representation which required looking for further site capacity for housing to test the scale of unmet need. The draft HELAA identified a shortfall of 4,072 dwellings to meet the development needs of the District (based on the Housing and Economic Development Needs Assessment, January 2016). Following the review of sites and options for meeting housing need this reduced the shortfall for housing. See Table 7 Change in Potential Supply as a result of the post Draft Local Plan review (HELS5).
- 1.10 The expansion of Princes Risborough is one of the key options with the potential to accommodate further growth. However due to the large scale of the expansion area with significant infrastructure requirements, not all of the expansion area will be delivered in the plan period. See Matter 8, Q4 for further detail and also Matter 2 Q5.

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

- 1.11 The assessment of the overall capacity of the District to accommodate growth is considered in response to Q1a. This includes housing density assumptions or site capacities. These have been considered in detail to ensure sites are optimising development potential, but within development constraints and the principles of good place shaping.
- 1.12 There is no one size fits all approach to considering the potential of individual sites and therefore we consider it is not appropriate to apply blanket densities to sites. Each site allocation has been considered on

an individual basis and how this has been determined is identified in the HELAA.⁴ The agreed joint HELAA methodology⁵ paragraph 2.40, explains how the capacity of sites should be assessed, and this is the approach the Council has taken. Site assessments for all the main sites considered have involved assessment by landscape architects and, where proposed in the draft Plan, assessment by urban designers to consider their potential developable area and appropriate density.⁶ It is important that density is considered on a net basis, not gross, so that site constraints are factored into identifying a net developable area. This is the approach to policies set out in the Local Plan.

- 1.13 All site densities were reviewed following the Draft Plan consultation (summer 2016) in response to the GL Hearn Review of Housing Capacity in New Wycombe Local Plan Consultation Draft On behalf of Aylesbury Vale District Council (HELS4). In our 'Response to Aylesbury Vale Review of Housing Capacity' (HELS5), paragraphs 6.1 – 6.4 sets out the results of the review. The response also considers the former reserve sites and identifies net densities, taking into account constraints such as AONB, topography, flooding and ecological constraints, many of the sites which are affected by these constraints.
- 1.14 The Sustainability Appraisal⁷ tests reasonable alternatives, one of which includes the option of increasing site densities (included in options C, D and E). This is likely to result in a residual negative effect of greater significance on landscape and townscape compared to Options A and B (where density is not increased). Increased density on sites within, and in close proximity to, the AONB reduces the likelihood that mitigation will be able to reduce the significance of residual effects. Mitigation is likely to be more difficult and/ or expensive and could result in a development that is not in keeping with the surrounding local character.

⁴ HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version

⁵ HELS3 Central Buckinghamshire Housing and Economic Land Availability Assessment Methodology

⁶ HELS1.4 Housing and Economic Land Availability Assessment - Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use)

⁷ WDLP2 Sustainability Appraisal (SA) of the Publication (Regulation 19) Draft of the Wycombe District Local Plan

Increased density at sites proposed through Options C, D and E could make it more difficult to effectively integrate with existing development and communities. It could also result in a lower delivery of open/green space and recreational areas at the sites. Increased growth and higher densities at Kimble proposed through Options C and E could result in the coalescence of a number of small settlements and these communities could potentially lose their identity. See Table 18, page 67 'Appraisal findings for the spatial strategy options of the SA' (WDLP2) for further details.

- 1.15 Intensifying development within Urban Areas and Main Villages is an option in the SA which has been taken forward in the Plan. This maximises use of sites in most sustainable locations on surplus land. This option is in line with the settlement hierarchy. Table 13 and 14 of the HELAA show average densities for settlement tiers and Greenfield vs Brownfield. This shows already good densities with an average of 117dph for PDL sites and 30dph for green field sites. For green field sites in particular there is a need to take account of local sensitivities, for example topography and visibility, that could reduce net density as well as gross. In urban areas there are particularly high average densities with Tier 1 (High Wycombe) having an average of 126 dph. We have optimised site densities, maximising development whilst recognising the constraints.

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

- 1.16 The Green Belt removal sites were identified as part of the Council's Green Belt Assessment which was undertaken in two parts:
- 1.17 Part 1 of the review⁸ was carried out by Arup on behalf of the Buckinghamshire authorities (Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Wycombe District Council and Buckinghamshire County Council) to provide an assessment of the Green Belt at a strategic level. This looked at large 'general areas' of

⁸ GB2 Buckinghamshire Green Belt Assessment - Report Methodology and Assessment of General Areas

Green Belt, provided evidence of how different areas perform against the Green Belt purposes as set out in national policy, and recommended sub-areas that did not meet Green Belt purposes for further consideration by the respective Local Planning authority. The assessment also considered whether there was any scope to add land to the Green Belt.

1.18 Part 2 of the review⁹ was undertaken by the Council and considered specific areas of Green Belt for further consideration, this included:

- Recommended sub-areas not meeting the Green Belt purposes that emerged from Part 1 of the review;
- Sites promoted to the Council either through Calls for Sites or through the Local Plan consultation process.
- Other wider sense check sites identified by the Council as potentially capable of contributing to sustainable development.

1.19 Following identification of the specific sites, each site was assessed through a four-step process to determine whether exceptional circumstances exist for removing the site from the Green Belt. This process is outlined below:

Step 1: Was the location capable of supporting sustainable development?¹⁰

1.20 As part of the overall spatial strategy underpinning the Local Plan, development should be directed to the most sustainable locations within the District. The Council's Settlement Hierarchy Study has been developed to reflect the relative sustainability of different settlements within the District. The Study identifies Tiers 1 to 4 as locations

⁹ GB1 Green Belt Part Two Assessment

¹⁰ NPPF paragraph 84

generally capable of contributing to sustainable development in terms of future housing growth.¹¹

- 1.21 In response to the Housing White Paper, the Council has further considered promoted sites on previously developed land (PDL) in lower-tier settlements to encourage the use of previously developed land.

Step 2: Was the site capable of removal from the Green Belt?

- 1.22 The Council considered a site to be capable of removal from the Green Belt when it satisfied the following requirements set out by the NPPF:

- The contribution a site makes to the overall aims and purposes of the Green Belt¹² - assessed by scoring the site against the Green Belt purposes. See Question 1d for more information on this part of the assessment;
- The creation of a rational built-up area which is consistent with the general extent of the Green Belt;¹³
- The need for enduring boundaries based on permanent physical features, to endure beyond the plan period.¹⁴

Step 3: Was the site otherwise developable?

- 1.23 In order to demonstrate that exceptional circumstances exist to justify an amendment to the Green Belt boundary it is necessary to demonstrate that the sites are likewise available and developable.

- 1.24 As set out in the NPPF, sites considered for housing should be in a location suitable for housing development, with a reasonable prospect that the site is available and could be viably developed at the point envisaged.¹⁵

¹¹ These settlements include: High Wycombe Urban Area, Marlow, Princes Risborough, Bourne End/Wooburn, Naphill/Walters Ash, Flackwell Heath, Marlow Bottom, Lane End, Stokenchurch, Longwick, Great and Little Kimble, Great Kingshill, Hughenden Valley, and West Wycombe.

¹² NPPF paragraph 79-90

¹³ NPPF paragraph 83

¹⁴ NPPF paragraph 85

¹⁵ NPPF paragraph 47 footnote 11

- 1.25 Sites proposed for employment must similarly have reasonable prospects of delivering the proposed allocation within the plan period and having regard to local market indicators and any other relevant factors.
- 1.26 As part of this step within the assessment process, a basic planning constraints assessment has been undertaken to rule out sites that would be unacceptable from a policy and constraints perspective. As the Chilterns AONB is a significant constraint on suitability, this part of the assessment seeks to rule out any sites that would be considered 'major development' in the AONB.¹⁶
- 1.27 In addition to the availability and suitability assessment, achievability must also be demonstrated to pass this step of the assessment.

Step 4: Were there Exceptional Circumstances to justify an amendment to the Green Belt?

- 1.28 Passing Steps 1-3 means that a site can be considered for removal from the Green Belt. Step 4 is an assessment as to whether the exceptional circumstances required by the NPPF exist. More detail on this step is set out in Question 3 below.
- 1.29 The conclusion of the above assessments is that exceptional circumstances exist to amend the Green Belt boundary to release 10 sites for housing and/or economic development. These conclusions are set out in the Green Belt Part 2 Report and relevant appendices.¹⁷

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

- 1.30 Yes. The contribution of the proposed removal sites to the Green Belt purposes was assessed in Part 2 of the Green Belt assessment. The

¹⁶ This assessment was carried out in more detail in AONB1 Area of Outstanding Natural Beauty Site Assessment Report, although this is also covered in GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3

¹⁷ Figure 8 GB1 Green Belt Part Two Assessment, p. 34, GB1.1 Green Belt Part Two Assessment - Appendix GB1 Individual Site Assessments - Steps 2 and 3, and GB1.2 Green Belt Part Two Assessment - Appendix GB2 Index Table of Findings - Steps 1 to 3.

contribution of the larger general area of Green Belt was assessed in Part 1.

- 1.31 The criteria for scoring Green Belt purposes was set out in the methodology of Part 1 by Arup.¹⁸ Purpose 5 (assisting in the regeneration of brownfield sites) was not assessed as it was considered that all sites would meet the purpose equally, and an assessment of this purpose would not add to the assessment. Each of the purposes was assessed 0 to 5 according to the Arup's method. Any site that scored 3 or above on any purpose was not considered suitable for release from the Green Belt, even if another purpose scored weakly. The logic underpinning this is that these higher scoring sites are sites which are important to be retained as Green Belt (for one or more reasons) and their removal would cause an unacceptable level of harm.
- 1.32 Appendix 1 contains a summary table of the assessment conclusions for the sites proposed for removal from the Green Belt.

2. 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?

- 2.1 The site specific approach to boundaries is informed by NPPF paragraph 83 and set out at paragraphs 2.23 - 2.25 of GB1. In each case we concluded that each of the removal sites either already benefitted from enduring boundary features, or this objective could be achieved with limited mitigation. Hand in hand with this paragraphs 2.6 - 2.7 of GB1 explains our approach to identifying the extent of land to be removed from the Green Belt to support the proposed allocations for development.

¹⁸ Figure 4.2: Criterion score in GB2 Buckinghamshire Green Belt Assessment - Report Methodology and Assessment of General Areas, p. 50. Each purpose has dedicated wording that is set out in GB2 Buckinghamshire Green Belt Assessment - Report Methodology and Assessment of General Areas, pp. 49-66

- 2.2 At a strategic level, the Council considers that there is some tension in the NPPF between ensuring that each successive local plan seeks so far as possible to meet up-to-date development needs at the same time as ensuring that there are exceptional circumstances for any green belt boundary changes, and further, that these changes can then endure beyond the current emerging plan.¹⁹ Before land could be safeguarded for future plan reviews we would logically first need to a) meet all current OAN and b) perhaps make some contribution to meeting unmet needs from adjoining constrained authorities.²⁰
- 2.3 Such all-encompassing requirements would require a significantly larger amount of higher quality land to be removed from the Green Belt. This would be both unacceptable in Green Belt terms but also it is likely to be unachievable, having regard to other non-Green Belt considerations such as the AONB, flood risk, and ecology for example. The Green Belt is also largely contiguous with the AONB around the main settlements and as such this would result in development of a major scale likely to be contrary to the NPPF in this respect.
- 2.4 Exceptional circumstances are unlikely to exist to remove land from the Green Belt now to meet unquantified future development needs (and any discussion of this point would also sensibly need to include consideration of the draft NPPF proposals). This approach would also be contrary to the NPPF paragraph 14 as the Green Belt would in effect cease to be a constraint on plan making.

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

- 3.1 In the Council's view, yes, there are exceptional circumstances for the proposed Green Belt amendments. Equally, our view is that there are not exceptional circumstances for releasing additional Green Belt land, either to meet current needs or to provide safeguarded land for future

¹⁹ WDLP10 Statement of Consultation, pp. 102-103. WDC have also submitted these points as a response to the recent NPPF consultation.

²⁰ Although there would be no unmet need if they were also required to meet full need and provide safeguarded land

plans. The likelihood that a constrained Green Belt authority will not be able to meet full OAN is acknowledged in national policy and guidance.²¹

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?

- 4.1 The exceptional circumstances are set out in full in Section 3 of GB1 Green Belt Part Two Assessment. As noted at 3.8 (and elsewhere) this is ultimately a site specific judgement, taking account of NPPF 79 to 86, but several of the most important issues are shared, such as the scale of development needs and the consideration of alternatives to releasing land from the Green Belt. Generically, the exceptional circumstances are that the scale of unmet need (and the contribution each site makes to meeting this) balanced against the contribution the site makes to the quality and function of the Green Belt weighed in favour of release of each site.

5. Do Policies DM43 (Replacement or extensions of dwellings in the Green Belt), DM42 (Managing development in the Green Belt) and DM45 (Conversion of existing buildings in the Green Belt and other rural areas) provide an appropriate mechanism for the managing the replacement, extension and conversion of buildings in the Green Belt?

- 5.1 The Council’s overall approach to Development Management policies is set out at paragraph 6.3 of the Plan and the justification for each policy is set out in the supporting text to the policy.

DM42 (Managing Development in the Green Belt)

- 5.2 The principle reason for proposing draft Policy DM42 is that there are certain points of NPPF paragraph 89 that, in our view, would benefit from some elaboration in the interests of clarity, certainty and

²¹ NPPF paragraph 14 footnote 9; NPPF paragraph 83; Planning Practice Guidance (PPG) Housing and Economic Land Availability Assessment (HELAA) paragraph 044 Reference ID: 3-044-20141006 Revision date: 06 10 2014 and paragraph 045 Reference ID: 3-045-20141006 Revision date: 06 10 2014 – as set out in paragraphs 1.15-1.16 of GB1 Green Belt Part Two Assessment

consistency. These issues assume significant importance as 48% of our District is within the Green Belt, and in 2017, 15% of all planning applications were within the Green Belt.²²

- 5.3 The first of these (i) – buildings for agriculture and forestry – is considered to be implied in NPPF paragraph 89, but including it in DM42 as an express point is an important clarification.
- 5.4 The next point (ii) then allows for rural workers dwellings. It is not clear in NPPF paragraph 89 whether ‘buildings for agriculture or forestry’ includes dwellings but the Council consider that the policy of ‘rural exceptions’ for dwellings of this type should apply equally in the Green Belt.
- 5.5 Point (iii) – replacement or extension of existing dwellings - is critical to consistency – together with DM43 (detailed below) this provides an even handed approach to the most common Green Belt planning applications.
- 5.6 The next point (iv) – limited infilling in villages – is drafted to resolve the grammatical ambiguity in bullet 5 of NPPF paragraph 89 as to whether the final modifying clause (‘under policies set out in the Local Plan’) applies to both types of development or just one. Taking account of wider sustainability considerations, alongside Green Belt considerations, the Council considers it appropriate to adopt a plan led approach to this issue.
- 5.7 The final point, point (v) – limited affordable housing to meet local needs – (with DM25) responds directly to NPPF paragraph 89, providing Local Plan policy for limited affordable housing, where this is needed.
- 5.8 All of the above sets the context for the proposed clause in 1a, which is drafted to allow Neighbourhood Plans to develop their own more local interpretation of these points – all in the context of the necessary requirement for their policies to have regard to the NPPF. In Bledlow-

²² Calculated in MapInfo GIS software

cum-Saunderton Parish for example, the NP includes an alternative approach to house extensions which is built around a different interpretation of 'proportionate extensions' than in either the adopted Local Plan or the proposed new Local Plan.

DM43 (The Replacement or Extension of Dwellings in the Green Belt (including outbuildings))

- 5.9 This policy responds directly to 2 related bullet points in NPPF paragraph 89.²³ This is broad brush, and for the most common forms of development (householder proposals), greater clarity is required to provide certainty and ensure consistency.
- 5.10 Part 1 relates to extensions. Part 2 to outbuildings. In both cases, the stricter limits proposed are superseded if a proposal accords with a Neighbourhood Plan or the site falls within an identified built-up village. The choice of volume as a measure of size represents a shift in local policy from the previous floor space measures, as it more accurately measures the impact of a building on the openness of the Green Belt, accounting for both the spatial and visual aspects.²⁴
- 5.11 The Council is conscious that in one limited respect draft DM43 is more restrictive than the NPPF insofar as the NPPF allows a 'reset' of the baseline size of a dwelling whenever it is replaced. Since 2012 and the publication of the NPPF we have experienced cases in our District, and are aware of cases elsewhere, where an original dwelling has been extended to the maximum permissible as a proportionate extension, then replaced by a 'not materially larger' than the existing extended dwelling, and then extended further proportionate to the size of the replacement, but very much disproportionate to the first dwelling. The Council considers that incremental development like this has an unacceptable impact in the Green Belt.

²³ See paragraphs 6.216-6.217 of WDLP1 Wycombe District Local Plan (Regulation 19) Publication version (including changes to the Policies Maps)

²⁴ See paragraph 6.218 of WDLP1 Wycombe District Local Plan

DM45 (Conversion of Existing Buildings in the Green Belt and other Rural Areas)

5.12 This policy draws on NPPF 90 'the re-use of buildings provided that the buildings are of permanent and substantial construction' (and similar requirements in various Permitted Development classes) to support the conversion of existing rural buildings (such conversions are not deemed PD within the AONB). On reflection it is considered that the most appropriate strategy for managing development of this type is to extend the exemption in DM45(1)(b) to all recently constructed buildings, and to extend the time period for this. This is particularly necessary to respond to the issue of the conversion of recently constructed stable buildings (in locations appropriate for stables, but not for a dwelling). To this end it is considered that DM31(1)(b) should be amended as set out below:

b) The building is not a building that was erected ~~for the purposes of agriculture or forestry~~ within the preceding ~~10~~ **25 years;**

WDC Statement Matter 6 Green Belt: Appendix 1: Summary of Assessment of Green Belt Purposes

Policy	HELAA reference	Site name	Purpose 1	Purpose 2	Purpose 3	Purpose 4
HW8	SHZ0035, SWC0093, SWC0097, SWC0099	Land off Amersham Road including Tralee Farm, Hazlemere	<p>The site is largely enclosed by a single built-up area. Land parcel does not serve as a barrier to sprawl.</p> <p>Score: a) Pass b) 1</p>	<p>This site comprises only a very small part of the wider gap between High Wycombe, Amersham and Beaconsfield. It makes no discernible contribution to this separation.</p> <p>Score: 0</p>	<p>The site contains 10% existing built form, including a mixture of residential buildings, agricultural buildings and a riding school. The buildings at the south of the site feel irregular, whilst buildings throughout the site seem to be sporadic and inconsistent. Site is most used as former agricultural and general countryside, part of the site in the north is being used as storage for caravans and some of the western boundaries are being used as extended residential curtilage. An established riding school as well as what looks to be a storage yard exists in the south. Overall the site exhibits a semi-urban character.</p> <p>Score: 2</p>	<p>Site does not abut an identified historic settlement core nor impact historic features.</p> <p>Score: 0</p>

WDC Statement Matter 6 Green Belt: Appendix 1: Summary of Assessment of Green Belt Purposes

Policy	HELAA reference	Site name	Purpose 1	Purpose 2	Purpose 3	Purpose 4
HW9	SHW0633	Part of Greens Farm, Glynswood, Green Hill, High Wycombe	<p>Site is almost entirely enclosed by the built form of High Wycombe and the surrounding farmland is part of the National Trust Hughenden Manor estate. This site makes little contribution to preventing sprawl.</p> <p>Score: a) Pass b) 1</p>	<p>Site extends no farther towards the next settlement (Hughenden Valley) than does the existing non Green Belt ribbon development. As such it makes little or no significant contribution to separation.</p> <p>Score: 0</p>	<p>This is an area of semi-natural green space set apart from the surrounding farmland. It is enclosed by housing along two sides, and substantial tree planting along the remaining two sides. Although not obviously publicly accessible there is a footpath which leads north-south along the eastern side which leads from the town into the open countryside. The site is part of this transition but its smaller scale and enclosure result in a semi-urban character.</p> <p>Score: 2</p>	<p>Site does not abut an identified historic settlement core nor impact historic features.</p> <p>Score: 0</p>

WDC Statement Matter 6 Green Belt: Appendix 1: Summary of Assessment of Green Belt Purposes

Policy	HELAA reference	Site name	Purpose 1	Purpose 2	Purpose 3	Purpose 4
HW10 HW11 HW16 HW17	SHW0462, SHW0559, SHW0561, SHW0646, SHW0648, SHW0649, SWC0012	Combined Wycombe Air Park and adjoining Booker sites	<p>The combined site adjoins the High Wycombe built-up area and if it was not already substantially built-up it would meet the purpose of preventing the outward sprawl of High Wycombe and serving as a barrier at the edge of the built-up area. However, the extent to which it genuinely contributes to meeting this purpose is very much undermined by the existing extent of built form within this area.</p> <p>Score: a) Pass b) 1+</p>	<p>The combined site falls between Lane End and Marlow Bottom, but also makes some perceived contribution to the perception of separation between High Wycombe and both of these villages. It encompasses the existing Green Belt settlement of Claymoor/Clayhill. The combined site is considered to be part of a wider gap where there is some capacity for development. The combined site is not considered to be essential to maintaining separation between these settlements.</p> <p>Score: 1</p>	<p>The land parcel contains a significant proportion of existing built form and overall it has a semi-urban character overall.</p> <p>Score: 2</p>	<p>Site does not abut an identified historic settlement core nor impact historic features.</p> <p>Score: 0</p>

WDC Statement Matter 6 Green Belt: Appendix 1: Summary of Assessment of Green Belt Purposes

Policy	HELAA reference	Site name	Purpose 1	Purpose 2	Purpose 3	Purpose 4
HW17	SHW0647	Land adjoining High Heavens Household Recycling Centre, Booker	<p>Site is not located at the edge of a large built-up area.</p> <p>Score: a) Fail b) 0</p>	<p>This site is a small part of a wider gap between settlements and makes no significant contribution to separation.</p> <p>Score: 0</p>	<p>Roughly 30% of the site is covered by built form but parts of the site are open to the wider countryside. Overall, the site exhibits a semi-urban character.</p> <p>Score: 2</p>	<p>Site does not abut an identified historic settlement core nor impact historic features.</p> <p>Score: 0</p>
MR6	SMA0105	Seymour Court Road, Marlow	<p>This site is effectively enclosed by the built-up area of Marlow. Although it is only directly connected along two edges the built-up area extends well beyond the site to both north and west.</p> <p>Score 1+</p>	<p>This site is a very small part of a much larger gap between Marlow and Lane End. Its contribution to the separation of these two settlements is almost negligible.</p> <p>Score 1</p>	<p>There is no built form within the boundaries of the site (except one small area of hardstanding), however there is strong built form adjoining on the south and the east. Site is a well-used walking route and looks to be used as countryside space. Site has minimal landscape views and weak links to the wider countryside and exhibits a semi-urban character.</p> <p>Score: 2</p>	<p>Site does not abut an identified historic settlement core nor impact historic features.</p> <p>Score: 0</p>

WDC Statement Matter 6 Green Belt: Appendix 1: Summary of Assessment of Green Belt Purposes

Policy	HELAA reference	Site name	Purpose 1	Purpose 2	Purpose 3	Purpose 4
PR11	SPR0036, SPR0082	Land to the rear of Poppy Road, Princes Risborough	<p>The parcel is located on the edge of the Princes Risborough built up area, nested between two sides of strongly established development. Although not entirely 'enclosed' by the built-up area it is notably more 'enclosed' than merely 'connected'.</p> <p>Score: a) Pass b) 1</p>	<p>Princes Risborough is a considerable distance from the nearest neighbouring settlements in the Green Belt to the south (Loosely Row and Bledlow Ridge). Site makes no discernible contribution to separation.</p> <p>Score: 0</p>	<p>Site contains approximately 4% built form and is not very well connected to the wider countryside. Due to its proximity to the existing built up area and the presence of existing residential uses in the southern part, the site feels mostly semi-urban in character. Site has short landscape views and is mostly shielded by trees.</p> <p>Score: 2</p>	<p>Site does not abut an identified historic settlement core nor impact the landscape or setting of a historic town.</p> <p>Score: 0</p>

WDC Statement Matter 6 Green Belt: Appendix 1: Summary of Assessment of Green Belt Purposes

Policy	HELAA reference	Site name	Purpose 1	Purpose 2	Purpose 3	Purpose 4
BE2	SBE0027, SWC0092	Hollands Farm, Bourne End	<p>Site is not located on the edge of an identified large built-up area.</p> <p>Score: a) Fail b) 0</p>	<p>Site does not provide a gap between settlements and makes no discernible contribution to separation.</p> <p>Score: 0</p>	<p>Land parcel contains circa 20% built form and the character of the unbuilt part is also influenced by the surrounding built form. Although the site seems to be mainly used as arable fields, development surrounding the site weakens the connection to the wider countryside, giving the site a semi-urban character overall.</p> <p>Score: 2</p>	<p>Site does not abut an identified historic settlement core.</p> <p>Score: 0</p>
RUR3	SLE0020	Land at Sidney House, Lane End	<p>Site is not at the edge of a large, built-up area.</p> <p>Score: a) Fail b) 0</p>	<p>Land parcel does not extend into a gap between settlements and makes no discernible contribution to separation.</p> <p>Score: 0</p>	<p>Site is entirely absent of built form, although adjacent to existing development on all sides. Site is relatively flat and has minimal landscape views. Due its small size and disconnect from the wider landscape the site is semi-urban in character.</p> <p>Score: 2</p>	<p>Site does not abut an identified historic settlement core nor impact historic features.</p> <p>Score: 0</p>

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Policy	HELAA reference	Site name	Purpose 1	Purpose 2	Purpose 3	Purpose 4
RUR7	SNH0019	Land off Clappins Lane, Naphill	<p>Site is not located at the edge of a large built-up area.</p> <p>Score: a) Fail b) 0</p>	<p>This site does not extend into the gap between settlements and makes a negligible contribution to separation.</p> <p>Score 0</p>	<p>There are no buildings on this site, and the field is used for grazing. It is however a relatively small field which is enclosed on 3 sides by housing and it has a weak connection to the wider countryside. Overall it exhibits a semi-urban character.</p> <p>Score 2</p>	<p>Site does not abut an identified historic settlement core nor impact historic features.</p> <p>Score: 0</p>
RUR11	SMA0080	Land at Heavens Above, 16 High Heavens, Marlow Bottom	<p>Marlow Bottom is not part of the large built-up area identified in Part 1.</p> <p>Score a) Fail b) 0</p>	<p>This is a small encroachment into a much larger gap between Marlow Bottom and the High Wycombe.</p> <p>Score: 1</p>	<p>The land parcel contains between 10% and 20% built form and possesses an urban character (the site comprises a house and its garden).</p> <p>Score: 1</p>	<p>Site does not abut an identified historic settlement core nor impact historic features.</p> <p>Score: 0</p>