
Subject 254465-00

Date 17 May 2017

Job No/Ref 254465-00-4-05-3

Wycombe Green Belt Assessment Part 2 – “Critical Friend” Summary Report

1 Introduction

This Summary Report sets out the overarching findings of Arup’s ‘Critical Friend’ input into the Green Belt Assessment Part 2, produced by Wycombe District Council. This Critical Friend role was provided between February and May 2017.

Arup was previously appointed by The Buckinghamshire Authorities (Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Wycombe District Council, and Buckinghamshire County Council) to undertake a Part 1 of the Green Belt Assessment, which will form part of a shared evidence base for forthcoming local plans in each of the four Buckinghamshire districts. Part 1 provided an independent and objective appraisal of all the existing Green Belt land as well as selected non-Green Belt land within Buckinghamshire, in particular by:

- Identifying and delineating logical and justified parcels of Green Belt land for assessment;
- Reviewing each land parcel against the NPPF Green Belt purposes 1-4;
- Evaluating and scoring the individual land parcels; and
- Presenting clear, comprehensive and fully justified conclusions on the performance of each land parcel.

Part 2 assessments have subsequently been progressed at district level by the respective local authorities. The aim of the Wycombe Part 2 Green Belt Assessment is to consider, through more detailed assessment, the appropriateness of any adjustments to the Green Belt boundary in respect of those areas identified in Part One, as well as proposals made in, or made in response to, recent Local Plan consultations. Arup was commissioned to provide independent expert advice on the emerging Part 2 Assessment, with a focus on ensuring:

- The work is objective and robust;
- The methodology and approach is aligned with the NPPF and other relevant policy and guidance (including the recently published Housing White Paper); and
- The Part Two Assessment is aligned with the work undertaken by Arup in Part One.

2 Scope of Review

During March 2017 Arup provided comments on a series of documents issued by the Council:

- Green Belt Part 2 Methodology Note (dated 17th February 2017);
- A total of 81 site pro-formas (setting out the detailed assessment work for each site considered).

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Following a meeting to discuss the key comments arising, the Council made revisions to its Methodology and pro-forma template. Arup has subsequently reviewed the following documents:

- Final Draft Green Belt Part 2 Methodology Note (dated 27th April 2017);
- Sample pro-forma template (dated April 2017); and
- Draft Wycombe District Council Green Belt Exceptional Circumstances Report (dated May 2017).

3 Key Comments

This section provides an overarching summary of the key comments arising from the Critical Friend review. This focuses on:

- Overarching comments around Wycombe’s general approach to the work;
- Key issues arising through the development of the methodology, including commentary on how the Council has responded to Arup’s comments through the drafting process;
- Comments around the Draft Green Belt Exceptional Circumstances Report, and areas that the Council should consider as the document is finalised.

Detailed comments are provided in Appendix A, comprising the following categories:

- **A:** Methodology Note (First and Second Round Comments);
- **D:** Sample Pro-Forma (May 2017);
- **E:** Draft Green Belt Exceptional Circumstances Report.

Comments in categories B and C relating to the draft site assessment pro-formas are subject to ongoing consideration by the Council and are thus omitted from this Report.

3.1 General Approach

The general principles around how sites were assessed through the Part 2 Green Belt Assessment were judged to be broadly logical, robust and aligned with National planning policy. However, notwithstanding this, Arup drew attention to a small number of perceived shortcomings in the overall approach.

Notably, it was felt that undue weight was placed on “defining boundaries clearly” in line with paragraph 85 of the NPPF, with this aspect of the methodology used as an initial filtering stage of the process. Arup cautioned such an approach, which it was felt risked removing areas from consideration too early before the potential to strengthen or create new boundaries has been fully considered, thus leaving the Council open to increased risk of challenge in latter stages of plan-making. Linked to this, it appeared that no provision was incorporated into the methodology to consider where site boundaries submitted by promoters might be adjusted to align with more defensible, recognisable features. In response to Arup’s comments, the Council:

- altered the general methodological approach to focus its initial filtering upon aspects pertaining to sustainable development (with a spatial and policy focus);

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- re-worked the methodology to incorporate a more flexible approach to boundaries, for example by clearly setting out how potential to mitigate weak boundaries would be identified, and by incorporating a new step in the methodology to review the suitability of site boundaries before undertaking the boundary assessment.

Ultimately, we are generally satisfied that the Council's updated approach adopts a greater degree of pragmatism in considering more fully whether there is scope to mitigate/strengthen boundary features or create new ones to support the progression of a site.

The second primary concern related to the scope by which possible 'exceptional circumstances' for release would be considered. Initially, Arup highlighted that the proposed approach to identifying exceptional circumstances, focused around performance of sites against the NPPF purposes and performance of sites in a more strategic context, was only the starting point in considering this; it was judged unlikely that the aforementioned factors alone would be sufficient to demonstrate exceptional circumstances. In response to this, the Council have developed a more precise, detailed approach which defines four key criteria which must be fulfilled for there to be an exceptional circumstances case for a site. While the additional clarity on process goes some way to addressing our comments, helpfully and logically defining the factors that may constitute exceptional circumstances, we have raised the point (through our Second Round review) that a greater degree of flexibility could be adopted in weighing up the different factors pertaining to exceptional circumstances (given evidence from other Local Plan examinations that wider exceptional circumstances may, for example, 'trump' the NPPF purposes).

3.2 Methodology Development

In addition to broad comments on the overall approach, more detailed comments on individual aspects of the methodology were provided. These were generally focused around two key areas:

- Details of how the methodology would be applied in practice; and
- The clarity and presentation of the Methodology Note.

Detailed comments are provided in section A of the Appendix. However, a small number of key comments are summarised below:

- While satisfied with the general approach of the assessment selecting areas for assessment, focusing on the Part 1 Recommended Areas and other smaller sites coming forward as part of the Council's wider Local Plan process, comments were raised as to how this information was presented. Subsequently, the Council has defined a series of categorisations for sites which more effectively articulates the origins of different sites being assessed.
- While supporting the principle of the Council's criteria around ensuring Green Belt releases represent 'rational' settlement expansions, we indicated that a more precise methodology (including definitions of key terms) was required for this part of the assessment. Following our Second Round review, further comments are raised around the clarity of this assessment and the justifications around ruling our standalone settlements from further consideration.
- General comments were raised around the presentation of the methodology, particularly in relation to the clarity of the proposed stages of assessment. The Council have reworked the methodology extensively to address concerns around how the overall process works and how the different stages of the assessment relate to specific sections of the Methodology Note.

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Following the Second Round review, minor additional comments are provided around how this presentation could be improved further.

In addition, Arup provided detailed comments on the assessment pro-formas. Detailed, pro-forma specific comments (not included as part of this Report) will be considered by the Council as the assessment is updated. Additionally, a number of more general comments were raised, with a new pro-forma template produced by the Council in order to address these. Four specific comments on the updated pro-forma are raised by Arup (see section D of the Appendix).

3.3 Draft Exceptional Circumstances Report

Arup has also reviewed an emerging draft of the Council's Green Belt Exceptional Circumstances Report (May 2017). Detailed comments are provided in section F of the Appendix.

While the majority of the comments raised relate to the clarity of the Report, and its alignment with the Methodology Note, a more substantive point is raised. Considering the Report in its totality, despite evidence that a thorough and rigorous process has been followed in assessing Green Belt sites, we believe that the document currently does not achieve its goal "to identify whether exceptional circumstances exist to warrant the removal of land from the Green Belt". One area that the Council should consider further is the balance between 'micro' (site-specific) and 'macro' (district-wide or more strategic) factors in forming the case for exceptional circumstances. In its current form, we do not believe that the closing sections of the Report adequately deal with this distinction, or delve into sufficient detail around the factors that will ultimately form the Council's case for exceptional circumstances.

While we believe that the key ingredients are generally present, these are currently scattered throughout the Report and not marshalled together in one single place. We would suggest that, in the Conclusions and Recommendations (or a separate section), a concise summary of all of the key factors pertaining to exceptional circumstances is produced. This should clearly cross-reference relevant evidence base documents, recognising that the case for exceptional circumstances cannot be justified based on the factors described in this Report alone. Additionally, we would suggest that further detailed consideration is given to the aforementioned 'micro' factors. Our recommendation is that each site proceeding to Stage 4 is afforded a more detailed conclusion setting out the key local considerations justifying why there may be exceptional circumstances to release that site. This could be in the main body of the report, or included as an appendix (and cross-referenced in Conclusions and Recommendations).

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APPENDIX: Detailed Comments

No.	Reference	Subject	Comment	Review Status (27/04/17)
A. Methodology Note First Round Comments (February 2017)				
A1	General Comment	Paragraph numbers	The paragraph numbers do not follow consistently throughout the whole document. We would advise that these are updated for clarity.	Addressed in updated version. No further change proposed.
A2	General Comment	Alignment of methodology across different sections	There are instances where different sections of the Method Statement do not read across, and/or do not feel completely aligned. One broad example would be para 1.8 (objectives of the assessment), which discusses three factors which should be considered to determine if a site is capable of removal from the Green Belt; these factors do not align with the three stages of the assessment discussed at para 3.2. It is assumed that this is a result of the evolution of Wycombe's approach beyond the original methodology set out by Chiltern/South Bucks (which we recognise within this text in a number of places). It is suggested that different sections are thoroughly cross-checked to ensure consistency.	We are satisfied that the applicable sections have been reviewed and updated to reflect WDC's current thinking on the methodology. No further change proposed.
A3	General Comment	Supplementary Flow Chart	We wish to clarify the purpose of this diagram in the context of the wider methodology, as it does not appear to be referenced within the text. Furthermore, we are not clear how it relates to the methodology set out from section 3 onwards (see comments A13 and A18). Please provide clarification as to how these are interlinked and, where necessary, update the methodology text to reflect this diagram. Separately, we are concerned more generally about filtering areas out too early using this method – see also comments A13 and A18 .	We note the inclusion of an updated diagram (Figure 2) which effectively supersedes the previous flowchart. We are broadly satisfied that this reflects the Council's overall approach and methodology and welcome the inclusion of clearly numbered steps and cross-references to the relevant sections of the methodology. We have made one additional minor comment regarding the diagram (see comment A31).
A4	General Comment	List of acronyms and abbreviations	We would suggest that the addition of a glossary for acronyms and abbreviations would assist in the legibility of the broader document.	While not fundamental to the assessment, we note that this has not been included and believe that it would aid understanding of the approach for the layperson. We additionally suggest that this could

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No.	Reference	Subject	Comment	Review Status (27/04/17)
				definitions for key terms of reference. Change not yet actioned.
A5	Para 1.6	Reference to Chiltern and/or South Bucks	We suggest that this is updated to refer to the Recommended Areas in Wycombe district.	We note that this is now updated as suggested at para 2.16. No further change proposed.
A6	Para 1.7 and 2.2	Scope of areas for assessment	While we concur with the general approach of this assessment to selecting areas for assessment, focusing on the Part 1 Recommended Areas and other smaller sites coming forward as part of the Council's wider Local Plan process, as a general point we are not entirely clear on the precise origins of these different areas. Currently, the references across these paragraphs do not read across; furthermore, we are not convinced either match with the sites featured in the supplied pro-formas (which will be subject to a separate review by Arup). We suggest that these paragraphs are updated together to ensure consistency, and that the origins of different sites are clearly set out, perhaps in bullet form as different 'categories'. In addition, we suggest that the logic for this selection is bolstered with further justification to support the requirement that the Local Plan evidence base is 'proportionate'.	We welcome the inclusion of this information at para 3.4, as well as the justification for this selection. No further change proposed.
A7	Para 1.8 (ii)	Identifying mitigation to ensure boundaries are 'fit for purpose'	We welcome acknowledgement that there will be, in many cases, potential for weaker boundary features to be mitigated to ensure their visibility and permanence. We suggest that, linked to this point, the Council may wish to expand this section or set out elsewhere in this Method Statement the types of mitigation that may be appropriate or necessary; we would assume this may include reaffirming a currently fragmented natural feature through a robust planting scheme (e.g. hedgerow or tree belt), or creating a new boundary feature as part of a development (as referred to at para 3.5).	We note the inclusion of a more detailed methodology at paras 3.15-3.17 and particularly support the inclusion of examples. While we have no substantive comment on this section, we have made one additional comment in relation to it (see comment A36).
A8	Para 1.8 (ii)	Instances where mitigation of boundaries not possible	Further to comment A6, while we acknowledge that the circumstances around such a decision are likely to vary from site to site, it is suggested that examples of such instances are provided to assist the reader in understanding the logic.	

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No.	Reference	Subject	Comment	Review Status (27/04/17)
A9	Para 1.8 (iii)	Extensions to non-Green Belt land	<p>While we support the principle of this criterion, we suggest that the assessment would benefit from definitions of terms and a more precise methodology (see also comment A21). We also wish to draw attention to the possible existence of larger, standalone PDL sites which, although not physically linked to existing non-Green Belt land, may be large enough to support standalone settlements or might be suitable for removal from the Green Belt for other reasons (e.g. in line with the Government's agenda on PDL/Transport Hubs set out in the White Paper). We would suggest that this possibility is considered as part of this factor.</p>	<p>While we welcome the expansion of the methodology, we still believe that further explanation/justification would help to support the logic of this section. Specifically, this would relate to:</p> <ul style="list-style-type: none"> - Defining what a 'rational' expansion would look like (e.g. related to existing settlement morphology, size/shape of the settlement expansion etc.) – perhaps examples could be included to support this; - Explaining the logic for this test, as discussed at our previous meeting (e.g. supporting development in sustainable locations, linked to other areas of the assessment; preventing the inseting of small areas of Green Belt isolated from existing settlements etc.). <p>Additionally, in relation to the text on standalone settlements, we are not convinced that such considerations should be ruled out purely under the assumption that such sites would be moderately/strongly performing Green Belt. We therefore suggest that this is linked more to the Council's concept of sustainable development and the wider evidence base (ie. has there been any work done on new settlements? Was this an option ruled out through broader Local Plan work?).</p>
A10	Para 1.8	Suitability and availability assessments	<p>While we recognise the potential value of considering suitability, availability and deliverability at this stage in the process, we would wish to highlight the potential for conflation with the Council's broader site selection process, and emphasise the importance of consistency. Assuming that the factors used to select sites would not be limited to the brief list of factors set out here, our initial suggestion is that these factors could be dealt with separately as part of a site selection report, with the Green Belt conclusions feeding into this work. Furthermore, we would</p>	<p>Further to our previous discussion we are satisfied as to the role that this plays as part of the assessment and welcome the specific reference to the wider evidence base. No further change proposed.</p>

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No.	Reference	Subject	Comment	Review Status (27/04/17)
			advise the Council to set out here, or elsewhere in this Method Statement, whether these assessments are used to ‘filter’ or draw conclusions or sites, or whether this information is provided for context only.	
A11	Para 3.2	Stages for the assessment	Further to comment A2, it is suggested that the three stages of the assessment are set out clearly up-front here to aid the reader’s understanding of the overall assessment process. We suggest that this is supported by a simple diagram (aside from the flow chart supplied with the Method Statement).	We are satisfied that the updated methodology, including Figure 2, is logically structured and clear as to the assessment stages. No further change proposed.
A12	Para 3.2	Scoping and selection of sites	We would wish to query the logic of this sentence, which we assume originates from the Buckinghamshire-wide origins of the methodology. Furthermore, we would suggest that the process set out has been superseded by the firmer definition of the areas for assessment set out previously; as such, we would suggest that this sentence could be omitted.	Sentence removed and new text clearly explains how assessment areas have been identified. No further change required.
A13	Potential Boundary Assessment Section	Clarity of methodology	Whilst we (as an informed party) believe we understand the process of this assessment, we would wish to observe that as currently written, these paragraphs do not seem to adequately explain the process of identifying potential boundaries for those approaching the process for the first time. Presently, while we believe it is implied, this section does not specifically explain that the durability of existing site boundaries are reviewed as part of this process. We suggest that this section is reviewed for clarity.	We welcome the much clearer description of this assessment at paragraphs 3.15-3.17, including the examples. We note the changes made to the methodology and welcome the Council’s decision to filter in relation to location and alignment with sustainable development principles.
A14	Potential Boundary Assessment Section	Role as part of the broader assessment process	While not articulated specifically in this section, the supplied flow diagram implies that this assessment is used as a ‘filter’ to exclude sites from further assessment. Assuming this is correct, we would wish to caution the use of the boundary assessment as a ‘filter’ to remove sites from consideration; our experience shows that filtering at this point risks removing areas from consideration too early before the potential to strengthen or create new boundaries has been fully considered and may leave the Council open to increased risk of challenge in latter stages of plan-making.	With respect to the boundary assessment, we are generally satisfied that the Council’s approach adopts a greater degree of pragmatism in considering more fully whether there is scope to mitigate/strengthen boundary features or create new ones to support the progression of a site. One additional comment is included in relation to this section (see comment A36).

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			We acknowledge that, due to the substantial volume of sites considered through this process, the Council have attempted a pragmatic approach to filtering areas for more detailed consideration. We support this pragmatism, but would suggest that the process of filtering areas for more detailed consideration is more explicitly tied to the overarching Local Plan goal of achieving sustainable development in the district, including the spatial vision/strategy. We would initially suggest that factor (iii) at para 1.8 may provide a more robust 'filter' to exclude sites from contention.	However, we note that the boundary assessment is, in effect, still used as a 'filter' (as sites must in effect pass this test to be judged "capable of removal"). We have included some further comment regarding this in the context of developing a case for exceptional circumstances – see comment A25 .
A15	Para 3.5	New Green Belt	In reference to the final sentence of this paragraph we wish to clarify whether new Green Belt is being actively encouraged as part of this Study. If so, we believe that further detail is required on how this would be assessed. If not, we suggest this reference is removed.	We note the removal of this, which aligns with our discussions face to face. No further change proposed.
A16	Para 3.7	Purposes 1-4	It is suggested that, for clarity, the second sentence is amended slightly to refer to the fact that the whole of the Green Belt in Buckinghamshire was scored against the NPPF Purposes 1-4 by Arup.	Given this section has been extensively rewritten, the comment no longer applies. No further change proposed.
A17	Para 3.8	Score of 3 / Explanatory Diagram	Our view is that the final sentence is superfluous in the context of the overall parcel scores, but that a reference to this could be included in the second sentence instead. Furthermore, we would support inclusion of the explanatory diagram used in the Part One study to support this paragraph.	Given this section has been extensively rewritten, much of the comment no longer applies. We note the inclusion of Figure 4. No further change proposed.
A18	Para 3.9	Typo	To ensure continuity with Part One ...	Given this section has been extensively rewritten, the comment no longer applies. No further change proposed.
A19	Green Belt Purpose Assessment Section	Use of Purpose Assessment as a filter	Further to comment A13 , although not stated specifically here, the supplied flow diagram implies that the Purpose Assessment is used as a 'filter' to exclude sites from further assessment. As an overall principle, we would suggest that sub-areas are considered further as part of the Local Plan process regardless of their performance against the NPPF purposes, given broader 'exceptional circumstances' can outweigh performance against the Purposes alone. This has been demonstrated through recent examinations (e.g. Vale of White Horse, Birmingham) and also referred to elsewhere in the Method Statement (para 3.12).	The purposes assessment is, in effect, still used as a 'filter' (as sites must in effect pass this test to be judged "capable of removal"). As per our review of comment A14 , please refer to comment A25 .

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No.	Reference	Subject	Comment	Review Status (27/04/17)
			Regardless of the Council's view on this, it is judged imperative that the criteria for filtering out moderately/strongly performing Green Belt areas is explained clearly as part of this Method Statement and justified in the context of the wider Local Plan process.	
A20	Para 3.13	Boundary Anomalies	We would observe that this para feels out of place and does not appear to relate to surrounding text. We would suggest that commentary on boundaries may relate more closely to the text at paras. 3.3-3.5.	We note that this has been removed and the text revised. No further change proposed.
A21	Para 3.14	Mis-reference	It is assumed that Figure 3 referred to here relates to a previous version of the methodology and suggest that this is removed.	Given this section has been extensively rewritten, the comment no longer applies. No further change proposed.
A22	Exceptional Circumstances Assessment section	Overall premise of the assessment	<p>Referring to para 3.15 of the Method Statement, which highlights the complexities associated with developing a case for exceptional circumstances, we wonder whether this part of the methodology should be referred to as such. Ultimately, the proposed assessment focuses on:-</p> <ul style="list-style-type: none"> - Performance of Green Belt sites against the NPPF purposes – site-level Green Belt factor - Performance of Green Belt sites in a more strategic context, as well as consideration of potential 'harm' to the wider Green Belt – strategic Green Belt factor <p>Ultimately, therefore, this assessment is only the starting point in considering exceptional circumstances and it is unlikely that the aforementioned factors alone would be sufficient to demonstrate exceptional circumstances. It is suggested that the overall section is reviewed to bring out this nuance and emphasise that this is only a starting point for considering whether or not exceptional circumstances might exist. We would also suggest that the name of this assessment is re-termed to reduce its any perception of definitiveness.</p>	In relation to exceptional circumstances, we welcome the inclusion of further detail on how this aspect of the methodology would work. However, questions remain on the precise details of the method. An additional comment is provided at A25.
A23	General Comment	Methodology for rationale of settlement extension and suitability/availability assessments	Para 1.8 refers to a third factor for consideration as part of the assessment: <i>To consider whether the removal of the site from the Green Belt would result in a rational extension to existing non-Green Belt land or whether it would result in an inappropriate and isolated area of non-Green Belt land set within the wider Green Belt.</i> We wish to query why this assessment is not referred to or covered as part of the more detailed	We are broadly satisfied that these comments have been addressed. Minor additional comments have been provided at A33 and A34.

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			methodology in section 3. Similarly, we wish to highlight that the assessments of suitability and availability referred to in para 1.8 are also not discussed in greater detail.	
A24	General Comment	Maps and pro formas	We would suggest that the addition of a sample pro forma and maps of the areas for assessment would enhance the presentation of the document for the reader and improve clarify.	We note the inclusion of a sample pro-forma (reviewed in the following section) and placeholder for a map. No further action proposed.

No.	Reference	Subject	Comment
Second Round Comments (May 2017)			
A25	Para 3.1-3.3	Exceptional Circumstances	<p>Further to our previous comment A22, we remain concerned that the language used in relation to exceptional circumstances is rather definitive when, ultimately, other high level, strategic factors may come into play. While it is helpful and logical to define the factors that may constitute exceptional circumstances (para 3.3), there is a risk that by making all requirements (i-iv) pre-requisites for consideration some more sustainable sites could be ruled out. Inversely, by stating that “exceptional circumstances will exist where all four of the following requirements are satisfied” this implies that there will be exceptional circumstances to release every site which meets these requirements, whereas we do not believe this is what is intended – indeed, by having a separate Stage 4, the implication that other factors could outweigh these considerations (e.g. suitability/deliverability etc.).</p> <p>The firmness of this process would also seem to strip out the element of planning judgement referred to in paragraph 3.2. While we believe the proposed methodology is broadly on the right lines, we would encourage further consideration with regard to the aforementioned challenges. WDC could consider whether the four ‘requirements’ should in fact be factors or considerations which should be weighed up against each other, and against other broader considerations.</p>
A26	Para 3.2	Managing growth around London	We agree with the rhetoric of this statement but wonder whether it downplays the role of the Green Belt in managing growth at the local, sub-regional scale?
A27	Para 3.3 (ii)	General extent of the Green Belt	While we understand this reference our view is that this term should be defined up-front at this point, or an alternative term used (given the potential for confusion with the reference in para 3.1).
A28	Para 3.3 (iv)	OAN	We feel it would be helpful to touch on the scale at which this is being considered (i.e. is this being considered at a sub-area level as well as in the round across the district?).

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A29	Para 3.6	Reference to “objectives”	Please clarify whether this refers to the objectives of this assessment or broader policy.
A30	Para 3.7	Non-Green Belt land	We do not understand this reference and suggest this is explained further, perhaps with a worked example.
A31	Figure 2	Fairness	We are unsure as to the use of the term “fairness” in the context of the assessment and wonder whether this should be omitted or rephrased?
A32	Para 3.13	Development needs	We wish to highlight the risk in conflating different strands of the assessment. Confusingly, this paragraph initially states emphatically that the assessment uses the same methodology as Part 1, but then implies it is somehow applied differently. We are of the view that it is unhelpful to discuss this contrasting assessment focus here (particularly in relation to “development needs”) as these factors are considered elsewhere in the assessment. We would observe that smaller areas will inevitably score differently to the parcels in which they sit because they have a different area/extent; we are not clear how a different assessment focus would impact upon scoring.
A33	Para 3.14	Rational extension	Referring back to our previous comment A9, we suggest that the term ‘rational’ is defined, or an example is provided to clarify the range of what would be considered rational.
A34	Para 3.14	“Beyond the Green Belt”	We suggest that this is revised to “inset within the Green Belt” given the potential confusion with areas beyond the extent of the Metropolitan Green Belt.
A35	Para 3.14	New settlements	While we believe the statement around new settlements is likely to be true, referring back to comment A19 we believe that sustainable development may have the potential to outweigh the NPPF purposes in some cases. Assuming that work has been undertaken by the Council around new settlements (for example, examined as a ‘reasonable alternative’ through the SA or as part of wider Local Plan evidence base work), we would suggest that this is used as the basis to rule such sites out rather than simply based on Green Belt performance.
A36	Para 3.17	Mitigation of boundaries	As stated in our review of comment A14, we welcome the inclusion of examples. Additionally, we would suggest that an example of where mitigation might be deemed unfeasible is also included to provide a counter.
A37	Para 3.18	Deliverability within 5 years	Please explain why deliverability within the first 5 years would weigh in a site’s favour for release, given the plan should identify sites throughout the plan period.
A38	Para 3.20	Exceptional circumstances considerations	We suggest that the final sentence could touch (briefly) on the types of factors that might be considered when weighing up the presence of exceptional circumstances.

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A39	General Comment	Exceptional circumstances – OAN requirement	It is not clear to us where the OAN requirement (iv) figures within the general assessment. We understand that requirements (i)-(iii) equate to Step 1, 2 and 3 of the overall assessment, but it is not clear if requirement (iv) is part of Step 4 and, in turn (and linked to comment A38), if this the only factor that would be considered as part of this assessment. We request that this is clarified.
A40	General Comment	Step 2	We understand that Step 2 of the assessment has three key aspects (as well as the additional sense check as to whether the site extent is correct). We suggest that, for clarity, these are given their own identifiers – we would suggest A, B and C. These should be referenced in Figure 2 and in the pro-forma.
D. Sample Pro-Forma Comments (May 2017)			
D1	Summary of Arup Part One Assessment of General Area	Part One Scores	We welcome the inclusion of a paraphrased summary from the Part One assessment, which we believe is proportionate and avoids repetition. However, we would suggest that the Purpose scores themselves are retained as an additional row above this section for additional context.
D2	General Comment	Site Description	Previous comment B2 suggested that the parcel descriptions provided in the Arup pro-formas should be included here for context. While we are satisfied that this is not required given the other changes made by WDC, we would suggest that a short description of the site is provided to assist the reader in understanding the key context. This should (at least) include the key boundaries of the site and relationship to settlements.
D3	General Comment	Step 1	We note that Step 1 is omitted from the pro-forma. We suggest, for completeness, that a box is included which provides a simple yes/no answer to this question, and confirms which settlement the site is around.
D4	Step 2	Unique identifiers	Linked to comment A40 , we would suggest that the different parts of the assessment are referred to individually as A, B and C (as per the wider assessment).
E. Draft Green Belt Exceptional Circumstances Report (May 2017)			
E1	Para 1.1	NPPF reference	We suggest that it might help the reader to have some explanation as to the context of exceptional circumstances, for example, a reference to what NPPF para 83 says.
E2	Para 1.1	Exceptional Circumstances	Referring back to comments A22 and A25 , we are concerned the language in relation to exceptional circumstances is too rigid. We suggest this is revised to "...identify whether exceptional circumstances may exist...", reflecting the wider range of evidence that is likely to inform the case.
E3	Para 1.4	Exceptional Circumstances	Following from comment E2 , we wish to clarify the accuracy of this statement given the assessment relates only to 'micro' site-specific considerations. However, as referred to later within the document, there are broader 'macro' factors which form part of the case for exceptional circumstances, evidenced outside of the assessment. We suggest that these factors are reflected here.

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Job No/Ref

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No.	Reference	Subject	Comment
E4	Para 2.1	Sifting process	Whilst we concur with how the sifting process has been described, we note that this process is not described in the separate Methodology Note and we would recommend that these are aligned.
E5	Para 2.1 / Figure 2	Paragraph references	We suggest that the diagram is updated to align with the relevant paragraphs within this document, or the final sentence of para 2.1 is moved into the diagram as a footnote (given many people will read the flow chart and be confused when the para references don't match this report).
E6	Para 2.3 (ii)	Source of promotion	We recommend that the 'Call for Sites' is referenced here for clarity.
E7	Para 2.4	AONB - Consistency with Methodology Note	Notwithstanding comment E8 below, we note that this aspect of the methodology is not covered in the detailed Methodology Note, and we would recommend that these are aligned.
E8	Para 2.4	Clarity	We wish to clarify the logic of this paragraph and suggest that it is updated to make it clear as to: - Whether "Our AONB assessment" refers to a separate assessment document - if so, this should be capitalised/given its formal title and sign-posting included clarifying where the reader can find it; - What the meaning of 'major development' is in this context (to the lay reader this could imply that only 'major' sites are being considered within this category). Furthermore, we wish to caution the statement in the final stanza of this paragraph, which we believe could be misconstrued as a blanket statement given 'major development' is undefined and is likely to vary depending on local factors (e.g. scale of the settlement etc.).
E9	Para 2.5	Cross-reference	We suggest that the location of the individual site assessments is cross-referenced here in the final version of the report.
E10	Paras 2.6-2.8	Additional White Paper sift – consistency with Methodology Note	Having revisited the relevant paragraphs of the Methodology Note (which we believe are 3.9-3.10), we do not believe these sections are entirely consistent as there is no reference within the Methodology Note to the additional category described here (PDL in lower tier settlements). We suggest that these are aligned.
E11	Para 2.6	Accessibility	We suggest that the final sentence is moved to a footnote.
E12	Para 2.7	"Sites which adjoin"	Please clarify how this is defined (i.e. immediately abutting, or close to the edge etc? Is there a defined distance beyond which a site would not be considered to "adjoin"?).

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E13	Para 2.7	Justification for approach	As currently drafted, this paragraph implies that, in a blanket fashion, releasing Green Belt in lower tier settlements would be ‘unsustainable’, when in fact the scale of release/development would have a substantial bearing on this. We suggest that further justification is provided as to why such an approach has been adopted. We assume this will be aligned with the spatial strategy; in other words, we assume that this focuses all growth in the most sustainable settlements, as defined through the settlement hierarchy. However, this is not set out clearly here.
E14	Para 2.8	Transport Hubs	Having cross-checked the Methodology Note we believe that the Transport Hubs and Tier 1-4 Settlements align, however this should be set out clearly here to avoid comments around why this was omitted as a category in itself.
E15	Para 2.9	Rural development	We would observe that this feels very detailed, whilst the information in the more detailed background Methodology Note is very brief. We would suggest that these sections are effectively ‘swapped’.
E16	Para 2.10	Figure number	Should this be called Figure 3?
E17	Para 2.10 (Figure)	Additional information	In addition to the promised figure, we would suggest that it would also be helpful if this showed: <ul style="list-style-type: none"> - Number of sites identified by settlement; - How many sites were sifted out after Step 1. We would also suggest that a choropleth map could be included illustrating which sites passed/failed this step.
E18	Individual Site Assessments Section	General Comment	Referring back to comment D3 , we suggest that this section is aligned if it is decided to include Step 1 within the individual site pro-formas.
E19	Para 2.11	Accuracy of statement (full individual site assessments)	Please clarify if this statement is accurate in light of the filtering process (i.e. if sites ‘fail’ Step 2, is Step 3 undertaken regardless?).
E20	Para 2.11	Reference to “non-Green Belt”	We suggest this reference is deleted (given the potential for confusion with non-Green Belt land).
E21	Para 2.12 (i)	NPPF purposes	We suggest that, for clarity, this is revised as follows: The contribution a site makes to the NPPF Green Belt purposes 1-4 of including land in the Green Belt, e.g. the separation between nearby towns.

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			Following this, we suggest that for robustness a small comment is added (potentially as a footnote) explaining why Purpose 5 is not included (cross-referenced to the Methodology Note is applicable), and additionally a footnote which lists individual purposes.
E22	Para 2.12 (ii)	Terminology - consistency with Methodology Note	We suggest that this is reviewed to ensure alignment with the terminology used in the Methodology Note.
E23	Para 2.13	Clarity – "...meets all three of the above criteria..."	We believe that this paragraph, as written, is currently unclear as the "criteria" are not explained. In other words, a site is capable of removal from the Green Belt if it performs weakly against NPPF purposes 1-4; however, it would not be possible to glean this from the current drafting. We suggest this is expanded slightly.
E24	Figure (Page 10)	Column header – "Site Assessment"	We are not clear why this column is titled as such – should this read "Settlement"?
E25	Figure (Page 10)	"Source" column	We would suggest that the verbal references are replaced with coded categories, which could be cross-referenced elsewhere (e.g. All the Arup RLPs could be Category A etc.).
E26	Figure (Page 10)	Minor edit	"ARUP" should be replaced with "Arup" (and throughout document).
E27	Para 2.18	"Unnecessary"	We suggest this is replaced with "inappropriate" to align with NPPF.
E28	Para 2.18	White Paper	We would wish to caution the grouping of the NPPF quotation with that from the White Paper. To clarify, these documents currently have a very different status in terms of how they would be weighted through the examination process (White Paper would have zero weight at present). However, we of course acknowledge the importance of 'future proofing' the work to ensure it remains up-to-date if/when the NPPF is amended, given the White Paper effectively expresses the Government's intention to amend the NPPF. As such, we suggest these paragraphs are separated and that these nuances are brought out more effectively.
E29	Para 2.21	District / Settlement Level	Further to comment A28, this paragraph implies (but does not explicitly state) that the issue of housing need is only being considered at a district-wide level. Theoretically, this implies that if the only sites that successfully pass through Steps 1-3 are in Tier 3 or 4 settlements then this is where growth would be directed. We suggest that the Council clarifies this point.
E30	Para 2.21	"...significant achievement..."	We suggest that this phraseology is rather informal and should be revised.

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E31	Para 2.24	Evidence Base	We would wish to observe that, currently, it is not clear how the evidence base has informed the alternative strategies to meeting needs. We would suggest that the relevant evidence base documents are clearly referenced here.
E32	Para 2.24 (v)	Small Scale Growth	Please clarify how this is defined.
E33	General Comment	Exceptional Circumstances	Considering the Report in its totality, despite evidence that a thorough, rigorous process of assessing Green Belt sites has been followed, we believe that the document currently does not achieve its goal “to identify whether exceptional circumstances [may] exist to warrant the removal of land from the Green Belt”. Referring back to comment E3 , we believe that the closing sections of the Report (and intended future sections not yet completed) do not adequately deal with the distinct ‘macro’ (district-wide) and ‘micro’ (site specific) factors that are likely to form the Council’s case for exceptional circumstances. While the ingredients for making this case are present, we would suggest that, in the Conclusions and Recommendations (or a separate section), a concise summary of all of the key factors pertaining to exceptional circumstances is produced. This should clearly cross-reference relevant evidence base documents, recognising that this cannot be justified solely based on the factors described in this Report. Additionally, we would suggest that further, detailed consideration is given to the ‘micro’ factors. Our recommendation is that each site proceeding to Stage 4 is afforded a more detailed (approximately 2 paragraph) conclusion setting out the key local considerations justifying why there may be exceptional circumstances to release that site. This could be in the main body of the report, or included as an appendix (and cross-referenced in Conclusions and Recommendations).