

**Please see the following text as the letter P&TGRS sent to the Wycombe District Council Planning Department, as there is significant disquiet about the assessment of the Green Belt particularly in relation to development proposals on Hazlemere Road, Penn**

Further to our letter of 1st August, we have the following additional points we should like to make: we hope you will feel able to take serious note of them.

The Draft Local Plan (DLP) refers at paragraph 4.77 to the Buckinghamshire Green Belt Assessment. This was carried out by Ove Arup & Partners Ltd (ARUP), a world renowned independent firm of engineers, consultants and technical specialists ; it identified *inter alia* by a stated methodology certain areas of the locality which could be confidently recommended for either retention as Green Belt (GB) or possible release from that designation.

ARUP's comprehensive Report states ( paragraph 1.2.2):

"The Green Belt Assessment provides an independent and objective appraisal of all the existing Green Belt land as well as non-Green Belt land within Buckinghamshire. This report has been undertaken in accordance with the Study Brief which is clear in its aspirations to:

- **Draw on best practice in Green Belt assessments in order to establish a robust methodology for assessing the Green Belt in Buckinghamshire against the five purposes of the Green Belt established in the NPPF;**

- **Identify and delineate logical and justified parcels of Green Belt land for assessment, review each land parcel against the five Green Belt purposes, evaluate and score the individual land parcels and present clear, comprehensive and fully justified conclusions on the performance of each land parcel;**

- **Consider whether land not currently within the Green Belt fulfils Green Belt purposes, specifically around major settlements at the outer edges of the Green Belt."**

The Report's recommendations of areas or sub-areas which the authority may wish to take forward to "Green Belt 2" appear in Chapter 6 (Table 6.1). They do not include area 33a, the fields at the side of the Penn / Hazlemere Road, either whole or in part. We commented on this in our earlier letter

**("Land off Penn Road Hazlemere (p.83) ").** In Paragraph 4.78 of the DLP, the Council states it " took " (*sic*) these ARUP denoted sub-areas but added other sites, including ones promoted by the development industry, to themselves assess these areas against GB purposes.

The Council has now issued the Draft Green Belt Part 2 Site Assessment ( DGB Pt 2) to reflect the commitment it gives in para.4.78. It brings under further assessment parcels of land in the GB which ARUP considered met NPPF criteria for remaining within the GB. This seems to us curious, unexpected and unjustified, given ARUP's pedigree and the independence and objectivity of their Report. The Council claims that DGBPt 2 has followed the same methodology for its assessment as that of ARUP but provides no evidence in support either of its claim ( eg. the qualifications of those carrying out the assessment ) or for its different conclusions. Does not this risk the credibility of either the ARUP Report or the Council's and of any decision based upon either ?

The following may more helpfully identify the different descriptions afforded to site 33a by ARUP and the Council:

ARUP -The boundary between the land parcel and the High Wycombe built up area is predominantly comprised of consistent boundary features such as public roads. The land barrier serves as an additional barrier to sprawl. Score Pass:

**WDC - In practical terms the adjoining woodland is the more significant constraint. Score Pass: 1 or 3**

Arup - Less than 5% of the land parcel is covered by built form

**WDC - Site contains 7% built form.**

**Draw on best practice in Green Belt assessments in order to establish a WDC - Site contains 7% built form.**

Arup - The land parcel has a largely rural open character, Score:3

**WDC - the site has weak links to the wider countryside and is semi-urban in character. Score:2**

Arup - Not recommended for consideration in stage 2. Score: Medium

**WDC- Site is relatively weak in Green Belt terms and capable of delivering housing. Site should be considered further for removal from the Green Belt.**

We do feel that these (and other) inconsistencies in the WDC Report may call into question some of its objectivity and professionalism when compared with ARUP's.

ARUP also refers in its report to the numerous Ministerial statements and National Planning Practice Guidance extracts which state that a Local authority should not remove land from GB to meet its objectively assessed housing need, specifically that unmet housing need is unlikely to outweigh the harm to the GB and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the GB.

In conclusion, we are concerned that 33a has been included in the DGB Pt2 In conclusion, we are concerned that 33a has been included in the DGB Pt2 without justification and that the DGB Pt2 may not have been given the same rigorous and objective assessment as that given by ARUP to the same areas.

We are aware, furthermore, that there is a strong legal covenant imposed in 1945 which requires the County Council to prevent the landowner from erecting any buildings and to keep the fields in 33a open and undeveloped. An option agreement relating to this land was registered by Inland Ltd, a subsidiary of Inland Homes Ltd, with the Land Registry in July 2016.

Considering that the land in question is presently AONB and in the GB and that the landscape and the amenity value was considered valuable enough to the locality for a substantial restrictive covenant on its use to be placed upon it in 1945 (and that the same conclusion about its being retained in the GB is reached by ARUP), you will, we think, understand why we are at a loss to understand why the authority judges that it has a sound basis for considering a change to its status. Penn & Tylers Green Residents Society