**Appendix 5**

The SBDC Green Belt Assessment states:

* The NPPF confirms Government attaches “great importance to Green Belts.”
* The NPPF confirms “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.”
* The five purposes of Green Belt still apply.

Given that your Assessment has tested the land in Option 9 and confirms that all parcels of Green Belt in Beaconsfield continue to perform all 5 purposes of Green Belt (with the only exception being the currently developed Wilton Park area), the Option 9 land remains of great importance and must be kept permanently open. Option 9 is not, therefore, suitable for release (with the exception of the Wilton Park developed area).

The SBDC Green Belt Assessment refers to the National Planning Practice Guidance which reiterates the importance of Green Belt. It states that “need” alone is not enough to override constraints on Green Belt land. Housing need has been stated as the key driver for the Study but housing need alone cannot constitute exceptional circumstances for release of Green Belt – para. 2.6 of your Assessment refers and see Calverton PC v. Nottingham CC & Others. **Exceptional circumstances cannot solely be framed around providing more houses.**

Need should not be met if “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits” and the NPPF “makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances.” No exceptional circumstances have been proven because:

* need alone is not sufficient to release Green Belt; and
* need has not been proven (see prior Appendices); and
* Option 9 continues to perform the 5 purposes of Green Belt; and
* the harm outweighs any benefit (which at best is described as “moderate.”)

Therefore, this Option 9 is not suitable for release or development (with the exception of the Wilton Park land currently developed).

The Option does not meet sustainability objectives. The following sustainability factors also significantly restrain the ability of the Council to meet its (unproven) need:

* Cultural heritage - severe harm would be caused to the Conservation Area of the historic core of Beaconsfield Old Town. The Core Strategy and current local plan emphasise the importance of the Green Belt setting of the historic core.
* Landscape –destruction of the countryside would ensue in a town for which the countryside is an important recreational amenity as there are no parks to speak of
* Biodiversity and geodiversity –mineral deposits would be sterilised, habitats destroyed
* Climate change would be accelerated
* Natural resources – important agricultural land would be lost forever and minerals negated
* Pollution – this Green Belt is desperately needed to mitigate against the polluting effects of the nearby M40, landfill site and traffic hotspots
* Transport and accessibility – all transport modes would be swamped by an extra 4,000 people
* Housing – viability of deliverability of affordable housing on this land not proven
* Health – bigger population in general and bigger population of elderly will swamp existing medical facilities

Our more specific comments on SBDC Assessment Part 2 of the 6 parcels of land in this Option are set out here:

**Reference numbers 1.13 and 1.13A (the A355 land):**

* There is no defensible boundary with Beaconsfield Golf Club because it is only a thin line of trees.
* The new relief road should not be considered as a justification for releasing surrounding land. The proposed relief road should NOT be a factor. Much Green Belt land across the country is bisected by roads – for example, the A40 and M40. The relief road is not an urbanising factor.
* This area is readily visible from the Conservation Area of Beaconsfield Old Town and its historic core. Causes irremediable and permanent harm to the character and setting of this old market town.
* Fragmentation is not a valid reason to release Green Belt.
* The parcel DOES contribute significantly to the gap between Beaconsfield and Seer Green.
* The Assessment states: “The land has a mainly rural, open character.” That should be protected.
* Your argument is circular: “if the area of land to the south is removed, Area 1.13A would not score strongly against one or more green belt purposes.” Put another way: release one parcel and use this release to justify release of neighbouring parcel and so on. This is SIMPLY WRONG. Cumulative impact would be unacceptable. This presumptive argument is flawed and should be struck out.
* This proposal is NOT sustainable – See Appendix 3.
* No transport benefits – the relief road would be swamped by over 4,000 extra residents, the town would grow by one third with unsupportable stress on its facilities.
* The Assessments states that the development would only have “MODERATE benefits” on housing – so NO exceptional circumstances.
* No positive benefits shown. Harm outweighs any benefit.

**Reference numbers 1.14 A and B (Wilton Park plus cricket club etc)**

* The Cricket ground is highly important to the town in a town where recreational facilities are severely limited.
* 1.14B should not be released. Your Green Belt assessment states that this land provides “no major benefits to housing” and therefore no exceptional circumstances can apply for its release.
* Football pitches are important local facilities in a town where recreational facilities are severely limited and should be retained.
* We would accept release of the currently developed part of 1.14A (Wilton Park) only (NOT 1.14B), but NO FURTHER RELEASE OF GREEN BELT IN BEACONSFIELD. Should the Wilton Park land be released, it should be for housing only; and only if need is proven in accordance with Appendix 1; and on the strict proviso that screening is retained and enhanced so as to screen all development from view; and so as not to adversely impact remaining green belt which MUST be protected.

**Reference number 1.15 (land between jct.2 and Pyebush roundabout)**

* This land has been proven by your assessment to continue to perform the functions of the Green Belt.
* It is a green finger into Beaconsfield, part of the green lungs of the town.
* It performs the highly important function of mitigating against pollution from the motorway – an area of air pollution monitoring.
* It is not joined to parcel 1.14 so this is irrelevant.
* It is highly strategic green belt between existing housing and the motorway and acts as an important buffer from deleterious traffic flow.
* It has significant tree cover – it gives the town its significant semi-rural feel and is important for health.
* It would only provide “moderate benefit” if released, therefore, no exceptional circumstances exist for its release.
* It has no current access –it would require very significant infrastructure to create one.
* If released, it would add to stress on Burnham Beeches.
* Floods.

In summary, no exceptional circumstances have been proven and the parcels of Green Belt continue to perform the 5 Green Belt purposes. Therefore Option 9 is not suitable for release beyond the currently developed Wilton Park area and should be removed from consideration and must not be taken further.