

Appendix 1: Critical Friend Comments (13-Sept-2016) on Draft Methodologies

A. Draft Green Belt Assessment Part Two Methodology published by Aylesbury Vale DC and Wycombe DC, July 2016			
Arup Comments			CDC/SBDC Officer Response
A1	Section 1.0	Introduction (general comment)	<p>The introduction, whose purpose is to set the scene for the assessment and establish its primary objectives, feels a little unstructured and, at times, unclear. The first paragraph, which ultimately sets the tone for the study, focuses immediately on the issue of the county's objectively assessed housing need. While this is clearly a key issue for the districts in their forthcoming plan-making, it feels premature to introduce this issue up front and would appear to undermine the assured objectivity of the overall assessment (introduced in para. 1.9).</p> <p>We would suggest that the section is restructured to focus initially on the 'story so far' (i.e. the Arup study), before introducing Part 2 and the objectives for this workstream. This would demonstrate more clearly the logic chain.</p>

A2	Para 1.1	Objectively Assessed Housing Need (OAHN)	<p>As highlighted above, while this is clearly a key driver for the Study, there are risks in framing the work solely around the issue of meeting OAHN. Legally, it is not clear whether meeting housing need would alone would constitute the exceptional circumstances required to bring about the release of Green Belt. Indeed, in para 2.1.11 of the Arup report (and para 2.6 of this report) Paragraph 044 of the PPG is referenced, which would appear to suggest not. In <i>Calverton PC v Nottingham CC & Ors</i>, the Council were able to demonstrate exceptional circumstances for a substantial release of Green Belt by showing that other options for development had been explored and rejected (“the limited availability of alternative sustainable sites” and the tightly drawn inner boundary of the green belt around Nottingham being key cited factors) and demonstrating that the proposed release “paid regard to the purposes of the green belt, the nature and quality of the proposed impingement, and the issue of sustainability”.</p> <p>We would suggest that, while the issues around OAHN are highlighted in the Study, the need to find land for housing is not cited quite so emphatically in the report in order to maintain a sense of neutrality/objectiveness.</p>	<p>Noted. Section 1 of the Chiltern and South Bucks Part Two report addresses these points by summarising National Planning Policy and National Planning Practice Guidance which reiterates the importance of the Green Belt and clarifies how Green Belt may affect the ability of an area to meet housing need.</p>
A3	Para 1.1	London Metropolitan Green Belt	<p>We do not feel that the reference to ‘London Metropolitan Green Belt’ is entirely helpful, given much of the Green Belt in Buckinghamshire was not designated in the original Metropolitan Green Belt. Furthermore, the wording somehow implies that the Green Belt is somehow ‘owned’ or imposed by London, when this is not the case. We would suggest the use of the term <i>Green Belt in Buckinghamshire</i> where relevant.</p>	<p>Noted. The term London Metropolitan Green Belt is not used in the Chiltern and South Bucks Part Two report. The term ‘Green Belt in Buckinghamshire’ is used where relevant.</p>
A4	Para 1.10	Further consideration	<p>It might be helpful at this point to more clearly set out what this ‘further consideration’ would entail (for example, is the performance of sub areas against the purposes being reconsidered, or are any other factors being taken into account?).</p>	<p>Noted. Section 1 of the Chiltern and South Bucks Part Two report addresses this point by listing the objectives of the Part Two Assessment. In addition, Section 3 explains the approach to Green Belt purpose assessment in Part Two.</p>

A5	Para 3.1	Assessment process for taking land out of the Green Belt	Again, we would suggest that this statement feels quite assumptive. Presumably as this is an evidence base document no decisions would be reached in the Study about which areas would be taken out of the Green Belt, more this document provides the evidence that would be required in order to do this through the Local Plan process. We assume that the Council would wish to weigh up options assessed through this report against others identified through the wider site selection process before any decision is reached on which areas are definitively proposed for release. As such, we would suggest that this reference is toned down.	Noted. The Chiltern and South Bucks Part Two report explains that the findings from the Green Belt Part Two Assessment will be considered alongside other elements of the evidence base as part of the local plan options appraisal process. That is the point at which consideration is given to the question of whether potential harm to the Green Belt is outweighed by exceptional circumstances in the context of consideration of a broader range of options.
A6	p.7	Flow Chart 1	While we recognise the merits of the proposed iterative process, and understand why this approach is taken, we do not believe the diagram provided is entirely helpful in explaining this. We would suggest that a flowchart with feedback loops and outflows (where sites could be removed from the process) would be more effective in showing the logic for the process.	Noted. The Chiltern and South Bucks Part Two report includes a flow chart which seeks to demonstrate more effectively the iterative nature of the assessment process.
A7	p.7	Flow Chart 1	Further to comment A6, we are concerned that the flowchart is rather simplistic in its approach to assessments that may require inputs from other evidence. For example, we believe that in developing exceptional circumstances broader considerations would have to be taken into account beyond performance against the NPPF purposes and site suitability/availability/achievability. We would suggest that these inputs are shown on the diagram.	Noted. The Chiltern and South Bucks approach to exceptional circumstances is designed to reflect the duty to achieve sustainable development and other key objectives such as planning positively to meet development needs where possible. It is a balanced framework encompassing a range of local and wider, more strategic considerations. The Chiltern and South Bucks Part Two report includes a flow chart which seeks to demonstrate this.

A8	Section B, paras 3.6-3.7	Defining the site boundary	<p>We have concerns about sub areas being removed from the assessment process prematurely as a result of this assessment, particularly given the boundary features identified for consideration in para 3.6 does not feel exhaustive. We would suggest that this list is reviewed and/or expanded to take into account the differing scale of this Study compared with Part 1.</p> <p>Furthermore, we believe that ruling out sites where a complete and strong defensive boundary cannot be identified would not be robust and could lead to challenges where sub areas might otherwise be identified as suitable/available/achievable through the HELAA assessment. We suggest that a greater element of professional judgement should be employed in cases where only limited mitigation would be required to ensure a readily recognisable boundary can be identified. This would be in line with legal advice that other clients have received in relation to the potential to create new boundaries and enshrine the requirement to do so in planning policy or SPDs such as development briefs. Furthermore, we suggest that this assessment is used to identify how preferential a sub area would be for potential release rather than ruling areas out in a blanket fashion.</p>	<p>Chiltern and South Bucks Districts consider it important that a consistent approach to boundaries is taken in Parts One and Two of the Green Belt Assessment. However adopting the Part One approach in Part Two does not preclude the use of professional judgement where only limited mitigation would be required to identify a readily recognisable boundary that is likely to be permanent. In addition, the Chiltern and South Bucks Part Two report states that further consideration may be given to the potential to create new Green Belt boundaries as part of the overall decision-making process for site allocations as part of the new local plan.</p>
A9	Section C, para 3.8	Exceptional circumstances	<p>The current phrasing of this section would appear to imply that the relative level of constraint on a site may be used to justify exceptional circumstances for release. In line with comment A7, we would like to highlight that the development of an exceptional circumstances case is likely to encompass a wide range of wider, more strategic considerations, and would therefore suggest that this reference is removed and any methodological discussion of exceptional circumstances is confined to Stage 2.</p>	<p>Noted. The Chiltern and South Bucks Part Two report does not include a section referring to the HELAA. The Chiltern and South Bucks approach to exceptional circumstances is designed to reflect the duty to achieve sustainable development and other key objectives such as planning positively to meet development needs where possible. It is a balanced framework encompassing a range of local and wider, more strategic considerations.</p>
A10	Section C, para 3.9	Typo	<p>Typo – ‘exceptional circumstances’, not ‘exception’.</p>	<p>-</p>

A11	Stage 2, para 3.10	Exceptional circumstances case	We believe, in line with previous comments, that exceptional circumstances cannot be solely framed around providing more houses. We would suggest that a more balanced framework is established in order to support the development of such a case, encompassing considerations such as sustainable development and the broader spatial vision for the district(s).	Noted. See response to comments A1 & A9.
A12	Stage 3	Methodology	This section discusses the 'wider impacts' of removing land from the Green Belt. It would be helpful if these impacts were articulated in further detail (for example, is this limited to the NPPF purposes or wider factors such as landscape?).	Noted. Section 3 of the Chiltern and South Bucks Part Two report explains the importance of understanding the wider strategic context as part of the assessment process.
A13	3.11	Typo	Typo – 'cumulative' instead of 'cumulate'	-
A14	p.10/11	Flow Chart 2	We are unsure why the NPPF purposes would not be considered in cases where development is already present. While this may be the appropriate approach, the implication is that the NPPF is not considered relevant to developing a case for release, which we believe could leave the methodology open to question.	A number of the areas in Chiltern and South Bucks Districts recommended for further consideration by the Part One Assessment have very limited or no additional development potential. It is considered that the Part One Assessment provides sufficient information on performance against Green Belt purposes in these cases. Section 3 of the Part Two report for Chiltern and South Bucks lists and describes the relevant areas.
A15	Category 4	Methodology	While we note that this section may not be applicable in the South Bucks/Chiltern context, we are concerned that this section provides little clarity on the practical approach to designating new Green Belt and simply quotes policy. We would expect this section to be developed out in further detail.	-
A16	Appendix 2	Identified areas for the Stage 2 assessment	We are happy that the map reflects the output from the Part 1 report, but note that there is nothing illustrating the additional areas that the local authorities have identified for further assessment. We suggest that a new map is produced to illustrate all of the areas under consideration.	Noted. The Chiltern and South Bucks Part Two report includes a map showing all areas of land falling within the scope of the Part Two Assessment in the two Districts. The areas of land are also listed in the Part Two report. Also see response to comment B1.

B. Notes by Chiltern and South Bucks District Councils to Supplement the Draft Buckinghamshire Part Two Methodology				
Arup Comments				CDC/SBDC Officer Response
B1	Para 5	Selecting the correct pro forma	<p>We are not clear by what mechanism development potential has been assessed in order to decide whether to complete Pro Forma 1 or 2. Please could this be explained clearly here.</p> <p>(Further comments are provided on the pro formas in section C).</p>	<p>The Chiltern and South Bucks Part Two report explains that Pro Forma 1 (relating to the RGAs and RSAs with limited or no development potential) has only been used in very few cases. They are all instances which are either existing built areas, have an implemented planning permission for substantial built development or comprise public open space. What they therefore have in common is no or very limited further development potential within the defined RGA/RSA areas. It is considered that the Part 1 Green Belt purpose scoring provides sufficient information for these areas.</p> <p>Pro Forma 1 has been used only in the following cases:</p> <ul style="list-style-type: none"> • Botley (Ref 1.02) – Green Belt settlement with a particularly urban character. • Tatling End (Ref 1.17) – Green Belt settlement. An area of significant encroachment with an inherently semi-urban character. • Denham (Ref. 1.18) – Green Belt settlement. Quite densely built-up with an inherently semi-urban character. • Land north of Iver including Pinewood Studios (Ref. 1.19) – The land with planning permission for expansion of Iver Studios. Development is under construction. • Taplow Riverside Area (Ref. 1.23) – The Green Belt settlement of Taplow Riverside which has a high proportion of built form and the Mill Lane MDS which has planning permission for demolition of existing buildings and structures and construction of 141 dwellings, 40 senior living apartments etc. Development is under construction. • Burnham (Ref. 1.24) – An urban park.

<p>B2</p>	<p>Para 8</p>	<p>Reviewing Arup findings</p>	<p>We assume that this refers the need to adjust the purpose scores accordingly for the sub area versus the General Area score from the Part 1 assessment? If this is the case, we suggest that this is brought out more explicitly (as the current wording implies that there may be scope to review the Part 1 assessments themselves, which may undermine the robustness of the wider Study).</p>	<p>The Arup assumption is correct. The Chiltern and South Bucks Part Two report explains that there is no scope to review the Part One assessment; the purpose of the review is to consider whether the purpose scores should be adjusted for the sub area only.</p>
<p>B3</p>	<p>Paras 10-11</p>	<p>Exceptional circumstances</p>	<p>We concur with the overall approach and believe that this broadly addresses the identified shortcoming in the Draft Buckinghamshire methodology (see comment A11), though we would suggest this framework could be developed further. We believe that the proposed focus on developing sustainable development options would be broadly compliant with the NPPF.</p> <p>We would suggest that the third consideration cited (Green Belt criteria) could focus not just on performance against the parcels, but also a wider consideration of potential harm to the Green Belt in terms of strategic integrity and the potential for harm to the broader purpose of the wider Green Belt as identified in the Part 1 assessment. We believe this is subtly different to the cumulative approach described in the Draft Buckinghamshire methodology (Part 3). We note that this would appear to be consistent with the proposed pro-forma template 1 – if this is the case, please bring this out more clearly in the methodology note.</p> <p>In line with previous comments, our view is that a robust exceptional circumstances case must be developed at the strategic level, and while site specific considerations would be an important factor (as highlighted in para 10) we believe that it would be helpful to highlight the need to consider these wider factors.</p>	<p>The Chiltern and South Bucks Part Two report explains that the question in each pro forma relating to the wider strategic function of the Green Belt is intended to consider potential harm to the Green Belt in terms of strategic integrity and the broader purpose of the wider Green Belt. The need to consider the role of wider Green Belt factors as part of the exceptional circumstances case is also explained in Section 3 (Methodology) of the Part Two report.</p>

C. Pro Forma to Supplement the Draft Buckinghamshire Part Two Methodology				
Arup Comments				CDC/SBDC Officer Response
C1	Pro forma 1	Part 3	Given the wording in the NPPF states that Green Belt boundaries can only be amended in exceptional circumstances, we are not clear what considerations would be made here. Please could this be set out more clearly in the pro forma. We assume that this could encompass boundary anomalies for example.	This is intended to deal with circumstances such as boundary anomalies and where there is a case for consideration of the creation of new Green Belt boundaries that will endure for the long-term as a result of the redevelopment of Major Developed Sites in the Green Belt. This is explained in Section 3 (Methodology) of the Chiltern and South Bucks Part Two report.
C2	All pro formas	General comment	Please refer to comment A8 on the definition of boundaries. We suggest that this should be a factor to weigh up in the overall decision making process rather than an arbitrary way of filtering sites, and believe that some of the considerations around spatial fit with the local plan options may be a more effective way of filtering sites (i.e. site is in a more/less favoured strategic option).	The list of boundary features used in the Part Two Assessment is consistent with the NPPF and with the Part One Assessment. It is considered important to ensure consistency of approach; introducing new features risks inconsistencies between the Part One and Part Two Assessments. The assessment process does not however preclude the use of professional judgement where only limited mitigation would be required to identify a readily recognisable boundary that is likely to be permanent. This is explained in Section 3 (Methodology) of the Part Two report. The Part Two report also explains that further consideration may be given to the potential to create new Green Belt boundaries as part of the overall decision-making process for site allocations as part of the new local plan.

C3	All pro formas	General comment	We note the reference in the Draft Buckinghamshire methodology to the assessment of areas in line with the HELAA methodology, as well as consideration of wider constraints. We note that there is no section within the proposed pro formas for this assessment and would wish to confirm if this would be undertaken in a separate pro forma. If so, it may be helpful to provide a summary of the conclusions from this assessment.	The HELAA assessment and consideration of wider constraints form separate strands of work to be considered alongside the findings of the Green Belt Assessment Part Two. To make this relationship clearer, the conclusions in Part Two relating to exceptional circumstances are couched in terms that exceptional circumstances <i>may</i> exist rather than that they definitively do exist. A definitive conclusion on exceptional circumstances cannot be drawn until the Part Two findings have been considered alongside other elements of the evidence base as part of the options appraisal process.
C4	All pro formas	General comment	We suggest that a section is added for site visit photographs which might assist in illustrating the assessment (e.g. boundary assessment), as well as a map.	A map is included in each pro forma.

Compare & Contrast Appraisal

of

Green Belt Assessments

conducted within

Wycombe, Aylesbury Vale and Chiltern & South Bucks Districts

February 2020

INTRODUCTION:

1. This document is prepared by Phillip Plato MRICS on behalf of Brown Not Green Chesham as an Appendix to a Hearing Statement submitted as part of the Local Plan Examination Hearings considering the Chiltern & South Bucks District Councils Local Plan.
2. In order to consider the Part 2 Green Belt Assessments undertaken by the District Councils in Bucks, it is helpful to first consider some background and what the Part 1 Assessment did and what recommendations it made for Part 2 Assessments.

BACKGROUND & PART 1 GREEN BELT ASSESSMENT BY ARUP:

3. In March 2016, ARUP published a Report on the Part 1 Green Belt Assessment of land within the county of Buckinghamshire to identify general areas throughout Bucks County, in order to assist all Districts therein with the preparation of their respective Local Plans.
4. The focus of the Part 1 Green Belt Assessment report was summarised in paragraph 1.2 therein, “...to provide evidence of how different areas perform against the Green Belt purposes set out in national policy; planning authorities may then take this into account alongside other evidence in making decisions about possible changes to Green Belt boundaries...”. The methodology for Part 1 Assessment was outlined in detail from page 41 onwards in Section 4 of the ARUP report. ARUP then described its assessment of numerous parcels of land throughout the county and each site was scored 0 to 5 (weak to strong) against the five purposes of including land in the Green Belt.
5. The Part 1 Assessment identified 36 General Areas & Sub Areas for further consideration. These were summarised in Table 6.1 of the Part 1 Assessment Report where it assigned each of the land parcels with a new ID reference number, with

unfortunate potential for future misunderstanding, as they were all referred to therein as “*Recommended Areas*”.

6. However, the Part 1 Report then made further recommendations which are recited below¹ in full together with the relevant paragraph reference number from Part 1. Namely;

6.1.1 Following the assessments of the General Areas against the NPPF purposes, a series of recommendations have been identified which the Buckinghamshire Authorities may wish to take forward in Part 2, including consideration of whether ‘exceptional circumstances’ exist to justify any alterations to the Green Belt boundary.

6.1.2 While it is clear that the majority of the Buckinghamshire Green Belt is performing an important role in terms of the NPPF purposes, a number of more weakly performing areas have been identified which may warrant further consideration.

7. The emphasis, as underlined herein, clearly asserts that further work was necessary and that the areas identified only might be suitable for removal from Green Belt. There was a clear implication of caution and a need to identify “exceptional circumstances” before any site should be removed from Green Belt designation.
8. This section of Part 1 went on to define four categories of areas to consider in Part 2 assessment as; (1) General Areas, that scored weakly that could be considered, (2) Whole General Areas, that scored medium to strong but with synergies to neighbouring areas which might warrant further consideration, (3) Medium or Strongly scoring General Areas, that had scope for subdivision by identifying weakly performing sub areas in presence of suitable boundary features, & (4) Non Green Belt Areas that could be considered for inclusion in Green Belt.
9. Significantly, the Part 1 Assessment then stated in its Conclusions that...

7.1.7 - It is important to note that the recommendations set out in this report will not automatically lead to the release of land from the Green Belt or the designation of new Green Belt. Ensuring maximum protection for the Green Belt, in line with national policy, should continue to be a core planning principle in the formulation of Local Plan policy.

7.1.8 The areas identified through this Study as warranting further consideration will need to be subject to more detailed assessment to determine the appropriateness and feasibility of any adjustments to the Green Belt boundary. Following this work, further decision making by the Buckinghamshire Authorities in updating relevant local development plans will determine which areas, if any, might be released from or added to the Green Belt.

7.1.9 The authorities will also need to carefully consider whether, in accordance with the NPPF, there are any ‘exceptional circumstances’ that justify the alteration of the Green Belt boundary through the preparation of new local plans. This will apply equally to any

¹ Underlining is by BNG for emphasis.

proposed additions or subtractions to land designated Green Belt. At that time, the authorities will need to consider the Green Belt boundary having regard to their intended permanence in the long term, so that any proposed boundaries are capable of enduring beyond the plan period.

PART 2 ASSESSMENT – JOINT STANDARD METHODOLOGY:

10. Part 2 Green Belt Assessments were subsequently undertaken in the three districts of Wycombe, Aylesbury Vale, and Chiltern & South Bucks.
11. The Part 2 Assessment that as undertaken in Aylesbury² (by ARUP) asserted; “*A joint methodology has been produced by Aylesbury Vale, Chiltern, South Bucks and Wycombe District Councils for Part 2 to ensure consistency*³ when the reports for this stage are being completed by the different authorities.” The Part 2 Assessment in Wycombe (also undertaken by ARUP) similarly indicated⁴ it had followed this joint methodology.
12. The joint methodology⁵ recognised that there is no national standard methodology for Green Belt assessment and as such the joint methodology was agreed as necessary to ensure consistency across the various Bucks districts and to set out the process for the Part 2 Assessments that the component districts would follow. It emphasised that further consideration and assessment needed be given to the areas identified in Part 1, including assessing the suitability of the areas for development, whether the boundaries meet the NPPF requirements, whether exceptional circumstances justified the release of the land from the Green Belt, whether there were reasons for including new land within the Green Belt and what the cumulative impacts of the proposed changes to the Green Belt would be.
13. The agreed joint methodology of Part 2 Assessment for all district councils further outlined the three assessment steps that needed to be taken and stated that,” *If one of the three steps changes, then the other two steps should be rechecked to ensure previous assessments have not changed as a result.*”
14. It further added that when considering smaller sites or revised development areas that,” *Each time the site area changes, the NPPF Green Belt purposes should be rechecked to identify whether this would result in a change to the assessment*”.

² See AVLP Green Belt Part 2 Assessment paragraphs 1.4 to 1.5

³ Underlining for emphasis by BNG

⁴ See https://www.wycombe.gov.uk/pages/Planning-and-building-control/Planning-policy/New-local-plan-examination-supporting-evidence.aspx#DynamicJumpMenuManager_1_Anchor_7 - paragraphs 1.11 to 1.12

⁵ See <https://www.aylesburyvaledc.gov.uk/supporting-documents-green-belt> -Doc CD/GB/002 para’s 3.4 to 3.5

15. Furthermore, the Part 2 standard methodology stated that; “*Where moderate and strong NPPF purposes are being met by the site, this site should not be taken forward for subsequent stages of assessment.*”
16. However, in contrast, the Part 2 Assessment within CSB, was undertaken by Council Officers. and it is notable that the standard methodology does not appear in the CSB Evidence Base presumably because in the intervening period CSB asserted that it had “developed” its own methodology⁶.
17. Section 3 of the final published version of CSB’s Part 2 Green Belt Assessment dated April 2019 is recited below;

Evolution of the Methodology

3.1 *This methodology has been developed specifically for the Chiltern and South Bucks Green Belt Assessment Part Two.*

3.2 *The methodology took as its starting point the draft methodology for Buckinghamshire published by Aylesbury Vale District Council and Wycombe District Council in July 2016. Aylesbury Vale District Council and Wycombe District Council undertook their Part Two Green Belt Assessments in advance of Chiltern and South Bucks in accordance with their July 2016 methodology. Chiltern and South Bucks Councils produced their own methodology which was used to complete the Draft Green Belt Assessment Part Two. This was published alongside the Green Belt Preferred Options Consultation in October 2016. Comments were invited on the methodology used for the Draft Part Two Assessment as well as on the Assessment itself.*

3.3 *The methodology presented here has undergone further amendments, taking into account the outcomes of the Green Belt Preferred Options Consultation and further evolution of the Local Plan and wider evidence. In particular:*

- *The entirety of the Green Belt in South Bucks and Chiltern was assessed against the NPPF purposes through the Part One Green Belt Assessment. The scope of the Green Belt Assessment Part Two is limited to the 30 areas that the Green Belt Assessment Part One concluded perform more weakly in Green Belt terms and which therefore warrant further, more detailed consideration.*
- *The Green Belt Part Two Assessment no longer includes a detailed assessment of Green Belt areas against a wider range of considerations linked to sustainable development, including consideration of alignment with the Local Plan objectives. That analysis now forms part of the Green Belt Options Appraisal.*
- *It is recognised that the performance of Green Belt areas in the context of national Green Belt policy is only one aspect of a much broader consideration of potential exceptional circumstances for amending Green Belt boundaries. Given the re-focusing of the Green Belt Assessment Part Two and the inclusion of broader assessment work into the Green Belt Development Options Appraisal, consideration*

⁶ See <https://www.chiltern.gov.uk/article/7399/Green-Belt-Assessment-Part-Two>- Page 11 Section 3

of potential exceptional circumstances now sits outside the scope of the Green Belt Assessment Part Two Update

18. It is unclear how or why this different methodology emerged. The original draft iteration of CSB’s Part 2 Assessment was published in July 2016 but unfortunately it is no longer available in the Evidence Base or within the “superseded documents” section of the Local Authority’s website. There is no summary of changes or a “track change”/ redline version to identify what changes were made from previous draft Part 2 Assessments.
19. However, a subsequent draft version of the Part 2 Assessment dated October 2016 is still available in “superseded documents” where in Section 3, it refers to Methodology. A comparison⁷ of the relevant paragraphs on methodology in the October 2016 publication with the final version published April 2019 seems appropriate. This is illustrated herein where items underlined in blue are new or replacement text, and items underlined in red are deleted or changed text as shown below;

From October 2016 version of Part 2 by CSB:

3.1 This draft methodology has been developed specifically for the Chiltern and South Bucks Green Belt Assessment Part Two. This methodology takes as its starting point a draft methodology for Buckinghamshire published by Aylesbury Vale District Council and Wycombe District Council in July 2016. Aylesbury Vale District Council and Wycombe District Council have undertaken their Part Two Green Belt Assessments in advance of Chiltern and South Bucks in accordance with the draft methodology in July 2016. Based on critical friend input (see Appendix 1) Chiltern and South Bucks Councils consider that the approach set out in this October 2016 methodology provides a more robust basis for their Part Two Assessment and it has been used in preference to the July 2016 draft”.

From April 2019 Final version of Part 2 by CSB:

3.2 The methodology took as its starting point the draft methodology for Buckinghamshire published by Aylesbury Vale District Council and Wycombe District Council in July 2016. Aylesbury Vale District Council and Wycombe District Council undertook their Part Two Green Belt Assessments in advance of Chiltern and South Bucks in accordance with their July 2016 methodology. Chiltern and South Bucks Councils produced their own methodology which was used to complete the Draft Green Belt Assessment Part Two. This was published alongside the Green Belt Preferred Options Consultation in October 2016. Comments were invited on the methodology used for the Draft Part Two Assessment as well as on the Assessment itself

20. The following comments and observations arise from this comparison;

- i. Changing the Oct 2017 wording of “the draft methodology” to “their July 2016 methodology” as well as deleting the first sentence of paragraph 3.1 of the Oct 2016 version, infers that the joint methodology was nothing to do with CSB when

⁷ Differences underlined; red underline = deleted from final version/ blue underline = added/changed in final version.

clearly the joint methodology was developed specifically for Chiltern & South Bucks to ensure consistency of assessment across the county given that ARUP were known to be continuing the Part 2 work for Wycombe and Aylesbury and CSB were going to do their own assessment.

- ii. In October 2016, it was stated that, “*Chiltern and South Bucks Councils consider that the approach set out in this October 2016 methodology provides a **more robust** basis for their Part Two Assessment and it has been used in preference to the July 2016 draft*”. It is questionable whether any methodology used by CSB in their Part 2 Assessment is “*more robust*” where it has resulted in Green Belt areas that had Part 1 scores sufficient to be excluded from consideration release within neighbouring districts, still being considered suitable for release within CSB’s district. Such methodology seems to be more liberal rather than “*more robust*”.

- iii. BNG disputes the assertion that the non-statutory Green Belt Consultation in October 2016 specifically invited public comments on “*the methodology used for the Draft Part Two Assessment as well as on the Assessment itself*”. The Green Belt Consultation document⁸ actually stated in paragraph 1.3 therein that, “*This consultation is limited to the Councils preferred development options in the Green Belt (1 hectare or more in size), the evidence base documents that support them and views on whether alternative or additional options should be considered. Sufficient work has been undertaken to arrive at preferred options however this work is not complete and is on-going. Responses to this consultation will inform decisions on which Green Belt options should be taken forward in the draft Local Plan*”. BNG’s view is borne out by the responses recited in the CSB Consultation Report & Responses to the Green Belt Consultation⁹ where within 128 pages of this report reciting all the issues raised in that consultation, there were only 4 references to methodology and those appear to be the issues raised by BNG supporters. Given the lack of comments on the Part 2 methodology in this consultation exercise,

⁸ Non Stat Green Belt Preferred Options Consultation - - https://www.chiltern.gov.uk/media/8628/Green-Belt-Preferred-Options-Consultation-Documents-Oct-Dec-2016-/pdf/Preferred_Options_Consultation_Document_-_Final.pdf?m=636130734232770000

⁹ Consultation Report & Responses published Nov 2017 - <https://www.chiltern.gov.uk/summary-of-responses-to-preferred-options>

what was the justification for making *further* changes to it as shown in the April 2019 version?

iv. The most significant observation is that despite changes in text and modified assessment methodology, the *outcomes* of both versions of the Part 2 Green Belt Assessments in October 2016 & April 2019 remain unaltered. This is implausible and is suggestive that the Part 2 Assessment has become an exercise of self-justification.

21. Further confusion and inconsistency can be seen when comparing the emerging Part 2 Assessment in respect of how “exceptional circumstances” were addressed; The October 2016 version of the Part 2 Assessment produced as its outcome, the “*Green Belt Development Options Appraisal*” report¹⁰ that itself was published for a non-statutory Green Belt public consultation. The 2016 Draft Part 2 assessment said in paragraph 5.3 “*The Part Two Assessment does not draw definitive conclusions on the question of exceptional circumstances; that is not one of its objectives. The Assessment does however consider whether exceptional circumstances may exist that would justify a change to the Green Belt and explains where and why this is considered to be the case. ...*” However, within the Green Belt Development Options Appraisal (produced from that draft Part 2 Assessment), exceptional circumstances *were* assessed and the conclusion for *some* site Option Appraisals¹¹ was that “*Exceptional Circumstances are not demonstrated – retain in the Green Belt*”. Why would some sites be appraised for exceptional circumstances at that stage and not others?
22. It is unclear how a different methodology to that referred in both the Part 1 Assessment and the October 2017 version of the Part 2 Assessment is justified?
23. However, this has led to significant differences between the assessment of Green Belt Sites within CSB compared to those assessed within neighbouring Wycombe and Aylesbury. These differences are illustrated below in the following table comparing CSB’s Part 2 assessment with the joint standard methodology used in the neighbouring Bucks districts of Wycombe and Aylesbury:

¹⁰ See CSBLP 15.4b - <https://www.chiltern.gov.uk/article/10352/Green-Belt>

¹¹ See CSLP 15.4b site appraisals for areas 1.04, N of Amersham, 1.07 N or Little Chalfont & 1.08 S of Little Chalfont.

SUMMARY OF MAIN DIFFERENCES OF PART 2 ASSESSMENT METHODS

<p>METHODOLOGY USED IN VALE OF AYLESBURY LOCAL PLAN (VALP) by Arup</p>	<p>METHODOLOGY USED IN WYCOMBE DISTRICT COUNCIL LOCAL PLAN (VALP) by Arup</p>	<p>METHODOLOGY USED BY CHILTERN & SOUTH BUCKS DISTRICT COUNCILS</p>
<p>Followed Green Belt Part 2 Assessment Methodology agreed between AVDC, WDC & CSB DC – July 2016</p>	<p>Followed Green Belt Part 2 Assessment Methodology agreed between AVDC, WDC & CSB DC – July 2016</p>	<p>NOT CONSISTENT WITH OTHER BUCKS DISTRICTS - Devised own methodology between July 2016 and April 2019. Final methodology used was unclear & not subject to consultation.</p>
<p>Followed recommendations from Part 1 Assessment paragraphs 7.1.7 to 7.1.9 inc</p>	<p>Followed recommendations from Part 1 Assessment paragraphs 7.1.7 to 7.1.9 inc</p>	<p>DID NOT FOLLOW ALL RECOMMENDATIONS FROM PART 1 No review of RGA's until April 2019 version. Process appears confused & unclear.</p>
<p>Did not recommend any sites for removal from GB with any assessment score against any one GB function of 3 or higher.</p>	<p>Did not recommend any sites for removal from GB with any assessment score against any one GB function of 3 or higher.</p>	<p>Various sites <u>have</u> been recommended for removal from GB that have assessments scores of 3 against one or more GB functions.</p>
<p>Exceptional Circumstances were considered on a site-specific basis <u>as well as</u> at a strategic level.</p>	<p>Exceptional Circumstances were considered on a site-specific basis <u>as well as</u> at a strategic level.</p>	<p>Inconsistent approach;</p> <ul style="list-style-type: none"> ○ Some sites <u>were</u> identified with no exceptional circumstances circa 2016, ○ Many others were left under consideration merely because they had a “medium” GB purpose (ie: scored 3 on one or more GB purposes) and were left awaiting confirmation of an overall unmet OAN to justify GB release. ○ Separate Exceptional Circumstance report published claiming area wide circumstances (OAN)

CONCLUSION:

The different methodologies used have resulted in significantly different outcomes for Green Belt site selection in CSB compared to Wycombe & Aylesbury Districts.