

27 September 2021

Planning Department  
Buckinghamshire Council  
By email: [planning.comments.csb@buckinghamshire.gov.uk](mailto:planning.comments.csb@buckinghamshire.gov.uk)

Dear ,

**Planning Application Reference: PL/21/3151/OA Land Adjacent To Amersham Road and Minerva Way Beaconsfield**

We are writing to object to the above referenced Outline Application for the erection of residential dwellings including affordable housing, new vehicular access points off Amersham Road and the Eastern Relief Road, a local centre and associated infrastructure.

The Buckinghamshire branch of CPRE, The Countryside Charity, as a long standing charity, has a role to protect the countryside from developments that do not meet acceptable planning guidelines. We have over 40,000 members and supporters nationally and well over 400 members in Buckinghamshire alone. We would like to register CPRE Bucks' opposition to the above planning application for the reasons below. But firstly I recognise that you are fully familiar with the NPPF so please note that this is not attempting to explain anything, I am simply making these points for the record. References to the NPPF are to the July 2021 version.

**The site is within the London Metropolitan Green Belt**

As the NPPF makes clear (in Section 13), the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. As you will be familiar, Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This application is open land and clearly breaches purpose a) because it is extending the built-up area of Beaconsfield into the countryside. It also breaches purpose c)

(for the same reason) and works against prioritising derelict and urban land (purpose e). The latter is relevant because this site is not derelict or urban land - and there are many areas of brownfield that should be used first. It is very clear that this application would considerably expand the built-up area of Beaconsfield into the Green Belt - a classic example of “urban sprawl”.

### Very Exceptional Circumstances do not exist

Section 13 of the NPPF makes it very clear that Green Belt boundaries may only be changed in certain exceptional circumstances and that such changes can anyway ONLY be done through the strategic planning process of producing a Local Plan. Paragraphs 141 and 142 spell out what must be demonstrated before even considering if there are any exception circumstances. NONE of those actions at Para 141 a), b) and c) have been demonstrated, indeed there is lots of brownfield and greater density options available to the Council which need to be implemented before any Green Belt release can be contemplated.

Turning to the “very exceptional circumstances”, none of the exceptions in Para 149 of the NPPF apply in this case. Furthermore, the potential exceptions in Para 150 of the NPPF do not apply in this case either. In fact, the applicant has not even attempted to justify this proposal on any of those grounds at all.

### Justification is solely on the basis of out of date, redundant Policies

The Planning Statement for this application (OA-BEECHES\_PARK\_-\_PLANNING\_STATEMENT-4373826) makes much of the saved policies that were in the old South Bucks Local Plan, Core Strategy and the Bucks Minerals and Waste Local Plan. All of these are out of date (in some cases over 20 years old) and we would suggest carry no weight whatsoever in considering an application now. It also tries to bring into consideration the Chiltern and South Bucks Local Plan that was abandoned after being rejected by the Independent Inspector (but NOT for the reason stated in this Planning Statement!) Similarly, this rejected draft Local Plan carries no weight whatsoever.

It should also be noted that those old Policies were made against much older versions of the NPPF. The NPPF has been updated multiple times since those Policies are drawn up and in particular has been strengthened in terms of its protection of the Green Belt.

In summary, the Planning Statement attempts to justify this application on the basis of a set of Policies that are out of date, irrelevant and do not override the (current)

NPPF. It is particularly noticeable that the Environmental Statement, Chapter 6 “Planning Policy and Context”, which goes to some lengths to address various paragraphs of the NPPF but makes NO ATTEMPT WHATSOEVER to address Section 13 of the NPPF!!

There are a great many other issues with this application, but it is so clearly in breach of the NPPF regarding the Green Belt that it must be rejected on those grounds alone. We therefore strongly object to this application and urge the Council to comply with the NPPF and refuse it.

Yours sincerely