Draft Buckinghamshire Green Belt Assessment

Appendix 1: Consultation

February 2026

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Introduction

A1.1.   This appendix supplements Section 1 of the main report, which explains that neighbouring local authorities were consulted when developing the methodology for the Buckinghamshire Green Belt Assessment.
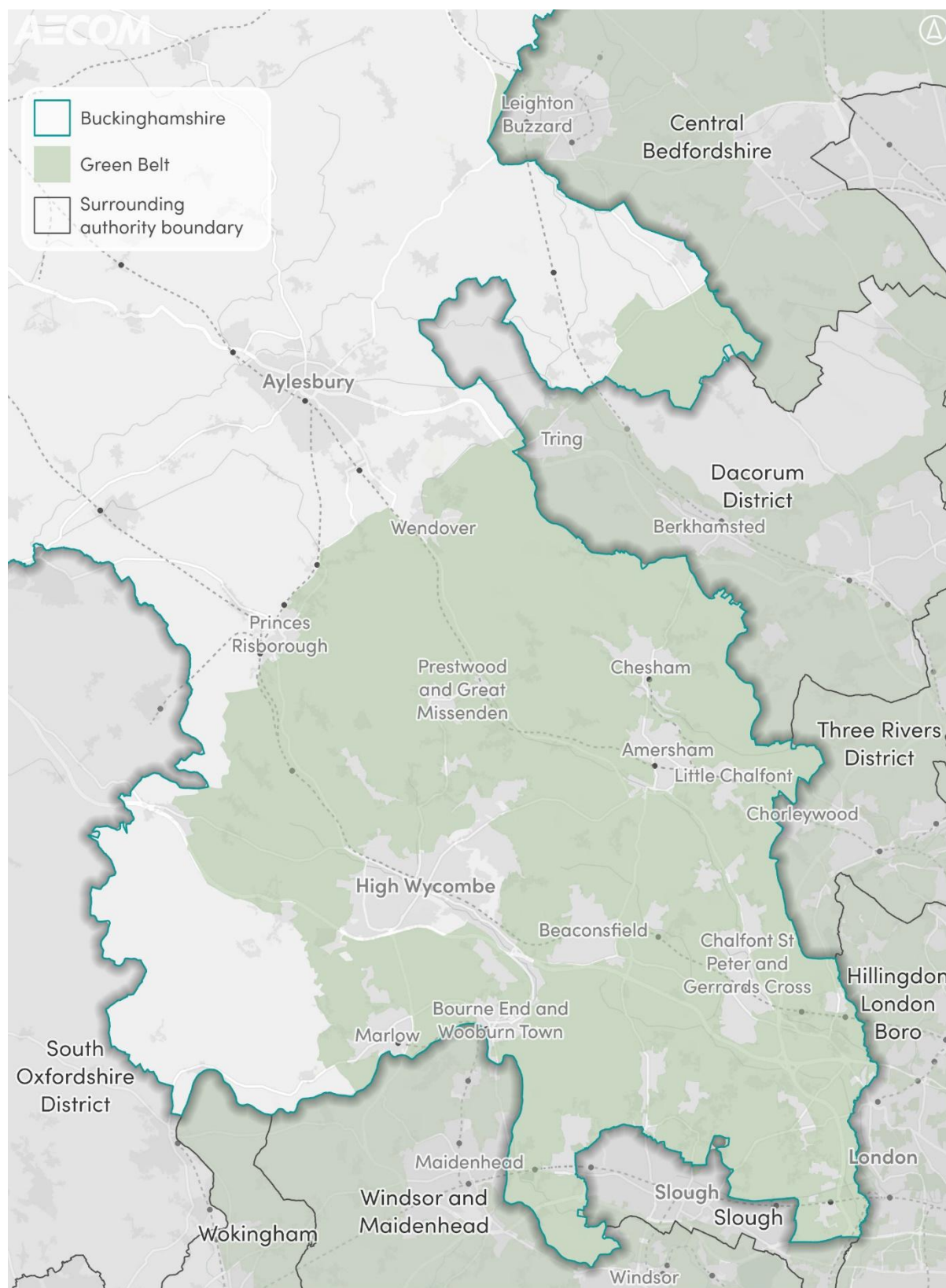
Consultation on the methodology

A1.2.   In July 2025 'notes' on the proposed methodology for the Buckinghamshire GBA were sent to:

- The Berkshire Local Authorities (a joint GBA is planned).

- The South West Hertfordshire Local Authorities (a joint high level GBA was underway, plus the authorities are undertaking individual GBAs).

- Central Bedfordshire Council

- London Borough of Hillingdon

A1.3.   The notes focused primarily on the matter of settlement classification, which is a key issue for any GBA, as discussed in Section 2 of the main report. In particular, the aim was to discuss criteria for classifying all settlements as either: A) a large built-up area; B) a town; or C) a village.

A1.4.   Additionally, the notes more briefly covered the approach to defining Assessment Areas (Section 3 within the main report) and the approach to assessment (Sections 4 and 5 of the main report).

A1.5.   Responses were received from the South West Hertfordshire authorities and the Berkshire Authorities, as discussed further below.

Figure A1.1: Local authorities adjacent to the Buckinghamshire Green Belt

South West Hertfordshire authorities

A1.6.   A meeting was convened between all of the relevant local authorities and their respective consultants leading on GBA. This was a two hour meeting held online on 2nd July 2025. The meeting was chaired by a representative of the South West Hertfordshire Joint Strategic Plan, who subsequently circulated a meeting note for comment. The meeting note was then finalised, and key points to note are as follows:

- Defining large built-up areas – this was a key matter for discussion, and there was not complete agreement, with differing views as to whether large built-up areas should be defined as cities and a sub-set of towns or alternatively all towns (given the PPG, which states that "villages should not be considered large built-up areas").

- Distinguishing between towns and villages – there was broad agreement on the need to account for both population and the local offer in terms of services and facilities. There was broad agreement that drawing a distinction between towns and villages is relatively straightforward in comparison to the matter of defining large built-up areas.

- Historic towns / large built-up areas – a further matter is defining those large built-up areas and towns that are 'historic' such that Green Belt Purpose D is engaged (Preserve the setting and special character of historic towns). There was no clear agreement on a definition.

- Footnote 7 constraints – matters were not discussed in detail, but there was brief discussion regarding what weight to put on National Landscape designation, with no clear agreement on this matter.

Berkshire authorities

A1.7.   A written response was received covering the following:

- The question was raised as to whether the GBA would be a "comprehensive" GBA that includes consideration of Purpose C or, alternatively, a GBA focused specifically on identifying grey belt such that Purpose C is omitted from consideration. It was then subsequently confirmed that the study is focused on identifying grey belt and so does not include consideration of Purpose C.

- On settlement classification, the Berkshire authorities stated that Slough, Maidenhead and Windsor should be categorised as large built-up areas (and, in turn, automatically also categorised as towns). The response elaborated as follows:

  "Our view is informed by the PPG: Green Belt (February 2025). Whilst this does not provide definitions of what constitutes a LBUA, town or historic town, it does usefully confirm that 'villages' should not be considered LBUA. It is therefore reasonable for a 'town' to constitute both a LBUA and town. The above settlements represent the largest towns within Berkshire relevant to the Buckinghamshire assessment and might reasonably be considered to be both a LBUA and town for the purpose of any assessment..."

- Finally, with regards to footnote 7 assessment, the response stated:

  "This has not been finalised yet; however, we do have some concerns regarding how you intend to treat National Landscape as a hard constraint.. we do not believe that any AA should be automatically screened out of the assessment to identify Grey Belt land if that AA falls within a footnote 7 area… This could be of direct relevance to Berkshire LPAs if the ability of Buckinghamshire to meet its housing land supply target is undermined by potentially suitable housing sites being automatically screened out of the assessment in this way."

Conclusion

A1.8.   The key matter is in respect of defining large built-up areas in the absence of any clarity nationally regarding whether all towns should automatically be treated as a large-built up area (such that Purpose A is engaged). Also, if there is to be scope to draw a distinction between towns and large-built up areas, there is a need to know 'where to draw the line'.

A1.9.   For the Buckinghamshire GBA we ultimately reached the conclusion that all towns should be treated as a large built-up area, and specifically: A) all towns in the top two tiers of the Buckinghamshire settlement hierarchy; and B) six towns in neighbouring areas. This is discussed further in Section 3.

A1.10. The other key matter is in respect of factoring-in National Landscape (NL) constraint as part of work to identify grey belt. This is discussed in Section 5 and Appendix 3 of the main report and, in short, we believe it appropriate to conclude that land within the NL is not grey belt within the *scope of this study*. There is clearly the potential for further work to be undertaken to identify land within the NL that does not contribute to the NL purposes to the extent that it can be grey belt, but any such work is outside the scope of this study. As such, the only alternative approach that could be taken through this study would be to disapply the National Landscape as a constraint, for the purposes of identifying grey belt, which we feel would not be appropriate. Finally, it is important to note that all assessment areas within the National Landscape are assessed against the three relevant Green Belt purposes (i.e. they are *not* screened out in this regard).