

# Draft Buckinghamshire Green Belt Assessment

Main report

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## Quality information

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# 1. Introduction

## 1.1. Background

- 1.1.1. This Green Belt Assessment (GBA) is focused on identifying grey belt within Buckinghamshire's Green Belt, i.e. that part of the London Metropolitan Green Belt that intersects Buckinghamshire.
- 1.1.2. This GBA follows the Green Belt Planning Practice Guidance (PPG, February 2025), which presents: "*Advice on the role of the Green Belt in the planning system.*" The PPG deals with (emphasis added):  
*"the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt."*
- 1.1.3. The National Planning Policy Framework (NPPF, December 2024) defines grey belt as follows:  
*"... land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."*
- 1.1.4. With regards to the Green Belt purposes referenced, these are:
  - A – Check the unrestricted sprawl of large built-up areas
  - B – Prevent neighbouring towns merging into one another
  - D – Preserve the setting and special character of historic towns
- 1.1.5. With regards to NPPF footnote 7, this reads:  
*"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites... and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change."*
- 1.1.6. Grey belt is covered at paragraphs 148 and 155 of the NPPF (2024), but focusing on paragraph 148, this states:  
*"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations."*

- 1.1.7. This means there is a sequential approach to the release of Green Belt for development. However, this is not a strict sequential approach, such that grey belt will not always be more appropriate for development than other land in the Green Belt given wider planning and sustainability factors.<sup>1</sup>
- 1.1.8. At this point it is important to differentiate between the following terms:
  - “Assessment” – of Green Belt means differentiating between Green Belt in terms of contribution to purposes and identifying grey belt.
  - “Review” – of Green Belt means deciding which areas of Green Belt to release (typically for development) in light of GBA and wider factors.
- 1.1.9. In this regard, the PPG explains:
 

*“... the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process. In doing so, we expect authorities to identify grey belt land to inform this review...”*

## 1.2. The Buckinghamshire Green Belt

- 1.2.1. As shown in Figure 1.1, the London Metropolitan Green Belt extends northwest as far as Princes Risborough, Wendover, Tring (in Hertfordshire) and Leighton Buzzard (just extending into Buckinghamshire). As such, the Green Belt covers most of southern Buckinghamshire south of Wendover and Princes Risborough, although it does not extend to cover the far southwest of Buckinghamshire (the Hambleden Valley west of Marlow).
- 1.2.2. For context, Green Belt in Buckinghamshire was first established in the 1950s, before being expanded in the 1970's and then the current extent was decided by a Structure Plan adopted in 1979. Green Belt covers 32% of Buckinghamshire but this figure excludes several large towns that are ‘inset’ from the Green Belt (i.e. if these towns were included then the figure would be higher). The Green Belt covers that part of Buckinghamshire that is most densely populated and overall best connected in transport terms, and it is important to note that the Buckinghamshire Green Belt borders Slough and the edge of London in the far southeast.
- 1.2.3. The Buckinghamshire Green Belt was last comprehensively assessed through a Green Belt Assessment in 2016/17. This current GBA can be considered an update but is notably different in that it is:
  - focused on identifying grey belt, which was a new designation introduced through the NPPF published in December 2024; and
  - undertaken under the entirely new Planning Practice Guidance (PPG) published in February 2025 which, to reiterate, is focused on guiding GBAs aimed at identifying grey belt.

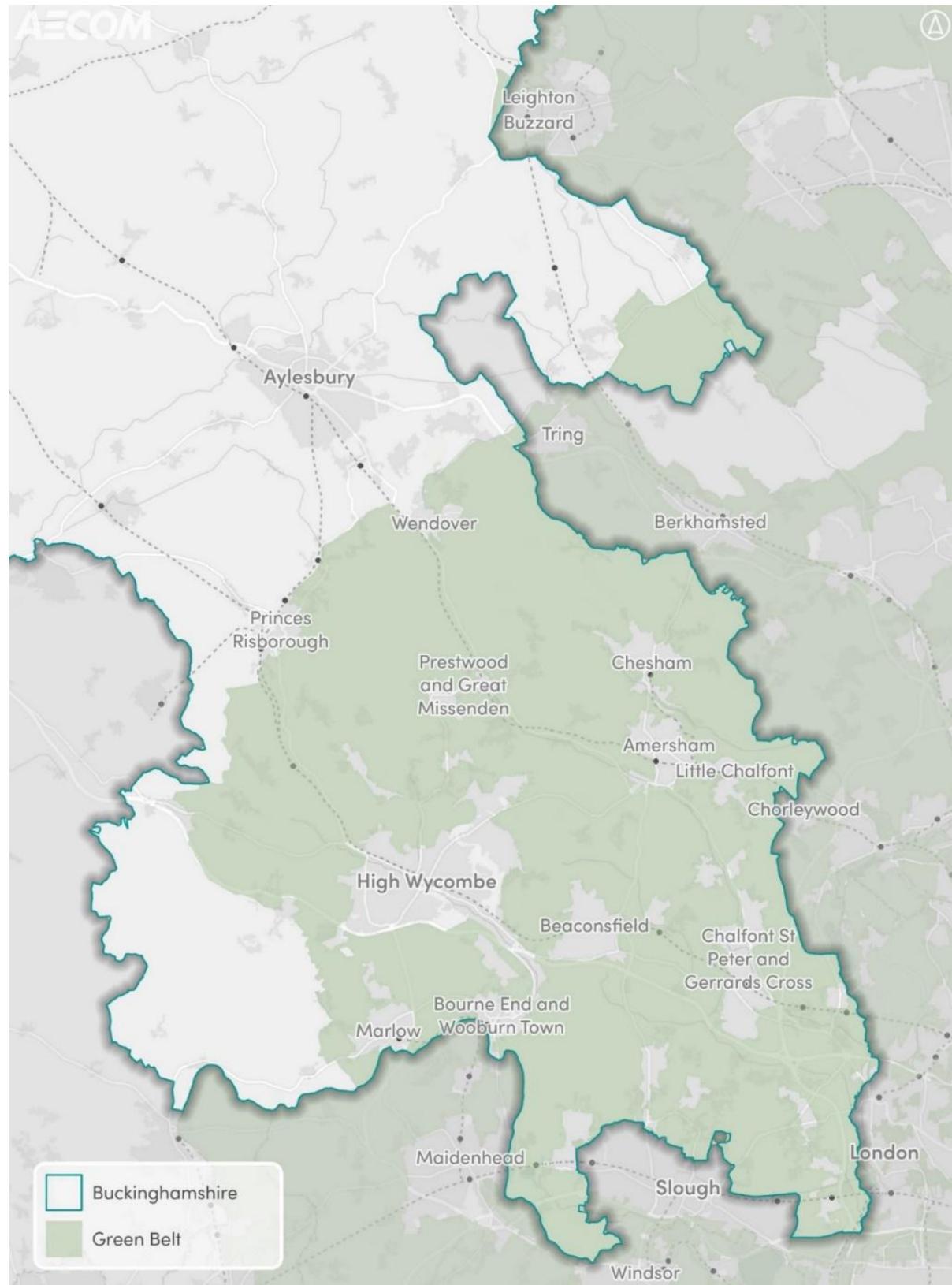
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<sup>1</sup> The PPG explains: “Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework (NPPF).”

Also, it explains: “Where land is identified as grey belt land, any proposed development of that land should be considered against paragraph 155 of the NPPF, which sets out the conditions in which development would not be inappropriate...”

1.2.4. Finally, it should be noted that, **the ‘study area’** comprises the Buckinghamshire Green Belt plus several modest areas outside of Buckinghamshire where assessment areas naturally cross over the administrative boundary. 96% of the study area is within Buckinghamshire.

**Figure 1.1: The London Green Belt within Buckinghamshire**



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## 1.3. Structure of this report

1.3.1. The PPG prescribes the following methodology:

- “Identify the location and appropriate scale of area/s to be assessed.
- Evaluate the contribution each area makes to Green Belt purposes (a), (b), and (d).
- Consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area.
- Identify grey belt land.
- Identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the plan area.”

1.3.2. On this basis, this GBA is structured as follows:

- Section 2 – explains work to define assessment areas (AAs).
- Section 3 and 4 – cover assessment against the Green Belt purposes.
  - Section 3 – explains the classification of settlements.
  - Section 4 – explains the assessment work itself.
- Section 5 – presents work to assess NPPF footnote 7 constraint.<sup>2</sup>
- Section 6 – brings the analysis together to identify grey belt.
- Section 7 – deals with the final step prescribed by the PPG.

1.3.3. Figure 1.2 summarises the report structure.

## 1.4. A note on the study scope

1.4.1. This is a **strategic study** with a primary aim of informing preparation of the Buckinghamshire Local Plan. This is in line with the PPG (as discussed).

1.4.2. The understanding of grey belt generated through this study can be drawn upon to inform detailed decision-making in respect of development sites. However, as part of this there may be a need for supplementary analysis recognising that this is a strategic study, and more specifically because:

- This GBA considers assessment areas (AAs) rather than sites or scheme proposals. Sites may well come forward for consideration within AAs that give rise to reduced concerns regarding impacts to Green Belt purposes and/or NPPF footnote 7 areas/assets than is the case for the AA as a whole, including having factored in scheme proposals.

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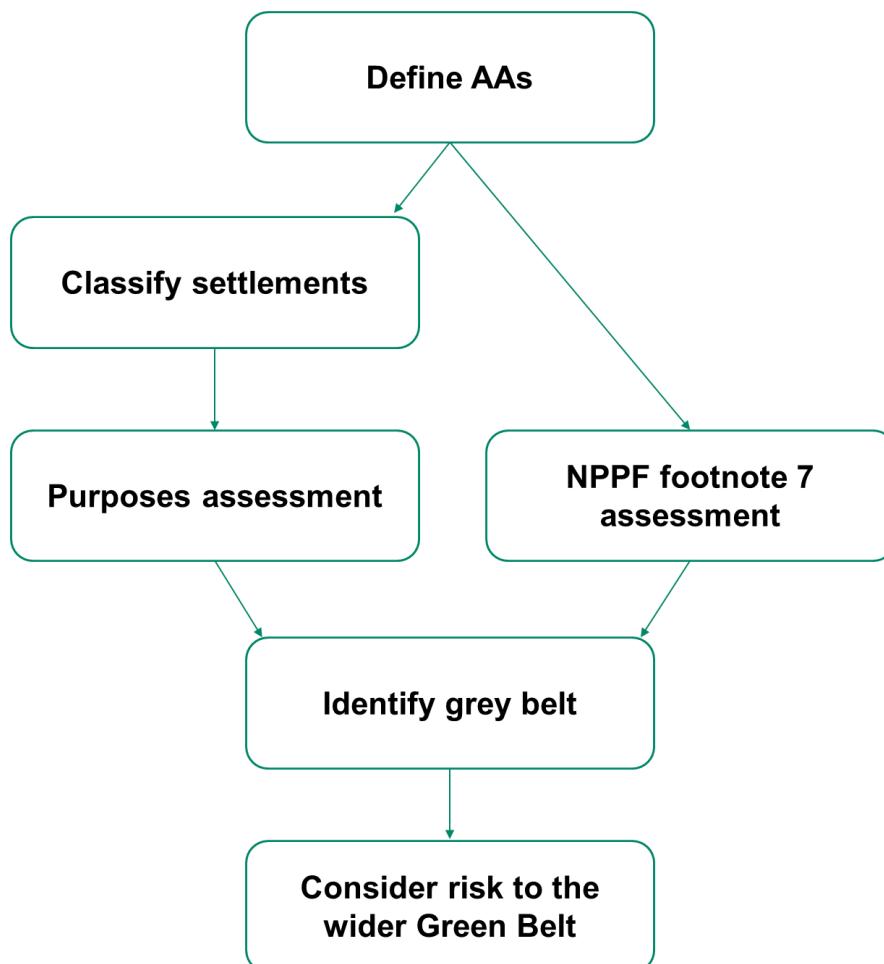
<sup>2</sup> Note that all AAs were assessed for NPPF footnote 7 constraint regardless of the outcome of purposes assessment, i.e. the assessment stages reported in Sections 4 and 5 were undertaken in parallel (see Figure 1.2) not sequentially.

- Assessment work in respect of footnote 7 areas/assets is proportionate to the early stage in the process. Detailed assessment is a matter for the plan-making and decision-making process, drawing upon detailed evidence gathering, technical analysis and the input of specialists as appropriate. Through this GBA we are able to give a steer regarding areas more/less constrained, but the scope of what can be achieved is limited. It is important to emphasise the need for further/ongoing work.

## 1.5. A note on consultation

- 1.5.1. Neighbouring local authorities were consulted on the broad approach and methodology in early 2025, and this is discussed within **Appendix 1**. In particular, there was a need to consult neighbouring authorities on the matter of classifying settlements, because there is no nationally standardised approach to classifying settlements for the purposes of GBA.
- 1.5.2. For example, there was a need to consult Three Rivers District on whether Chorleywood should be classified as a town or a village, which is a consequential decision for the Buckinghamshire Green Belt Assessment, given Green Belt Purpose B (prevent the merging of *towns*) and the proximity of Chorleywood to Little Chalfont, which is within Buckinghamshire and considered to be a town (see Section 3).

**Figure 1.2: Summary of the method and report structure**



## 2. Defining assessment areas

### 2.1. Introduction

2.1.1. This section deals with step 1 of the prescribed GBA methodology, namely: *“Identify the location and appropriate scale of area/s to be assessed.”*

### 2.2. Methodology

2.2.1. The PPG explains:

*“In assessing their Green Belt, it will in most cases be necessary for authorities to divide their Green Belt into separate assessment areas for the purpose of identifying grey belt. The number and size of assessment areas can be defined at a local level and respond to local circumstances. However, the following principles will need to be considered:*

- *when identifying assessment areas, authorities should consider all Green Belt within their Plan areas in the first instance to ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes*
- *a small number of large assessment areas will not be appropriate in most circumstances – authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary*
- *... consider where it may be appropriate to vary the size of assessment areas based on local circumstances. For example, the assessment of smaller areas may be appropriate in certain places, such as around existing settlements or public transport hubs or corridors”*

2.2.2. Within this, the key principles are:

- considering the entire Green Belt;
- ensuring that assessment areas (AAs) are “sufficiently granular to enable assessment of their variable contribution to purposes”; and
- defining “smaller assessment areas” particularly in “certain places” potentially more suitable for development.

2.2.3. This is a logical approach with a view to minimising variation to Green Belt purposes within AAs and, in turn, minimising situations whereby an AA contains areas of both grey belt and ‘not grey belt’ (such that whatever assessment conclusion is reached might be challenged).

2.2.4. However, it is also important to define AA boundaries in order to minimise internal variation in terms of the degree of constraint posed by areas/assets listed at NPPF footnote 7 (henceforth ‘NPPF footnote 7 constraints’). NPPF footnote 7 constraints are widespread across the study area and there are areas of overall high constraint in NPPF footnote 7 terms.

2.2.5. In short, there is a need to define AAs with the subsequent assessment in mind, and recognising the need to balance two factors:

- Variable contribution to Green Belt purposes; and
- Variable NPPF footnote 7 constraint.

2.2.6. Having established these principles, the task was then to define AAs, and the starting point was the 171 AAs that were defined by the previous Buckinghamshire GBA in 2016. These were defined on the basis of a robust methodology that accounted for varying contribution to purposes.

2.2.7. The methodology from 2016 was robust and, in turn, the task in 2025 was to sub-divide the AAs from 2016 for the purposes of the current GBA.

2.2.8. This involved a broadly two step approach:

- Step 1 – define small AAs surrounding all non-Green Belt settlements, i.e. all those inset from or at the edge of the Green Belt (Figure 1.1).<sup>3</sup>
- Step 2 – define larger AAs away from non-Green Belt settlements given reduced potential for development (in line with the PPG).<sup>4</sup> As part of this, a distinction was drawn between areas:
  - Within the National Landscape (NL) – for the most part, the new AAs simply comprise the remaining part of the 2016 AA, i.e. that part not comprising a new AA adjacent to a settlement.
  - Outside of the NL – further sub-divisions of the 2016 AAs were considered, with a view to more granular analysis.

2.2.9. Finally, in addition to a focus on smaller AAs around settlements the PPG also requires a focus on smaller AAs at “transport hubs and corridors”. This particularly means AAs close to one of the 14 railway stations located within or close to the edge of the Green Belt and so the definition of AAs around each of the stations is a focus of stand-alone discussion in **Appendix 2**.

## 2.3. Conclusion on AAs

2.3.1. The outcome is that 808 AAs were defined such that, on average, each of the 2016 AAs was subdivided to form 5 new AAs. This is considered to demonstrate a commitment to granular and robust assessment of grey belt.

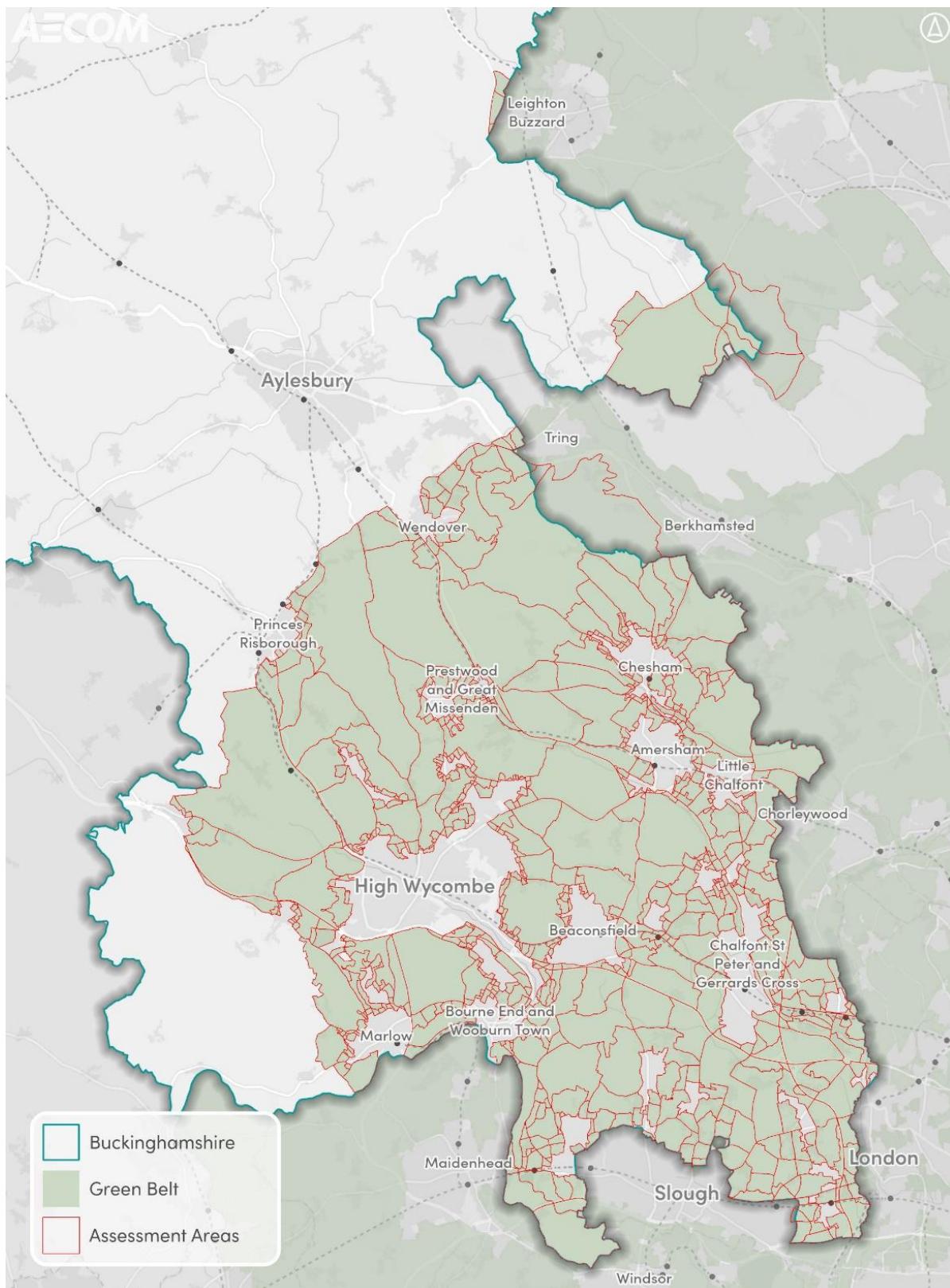
2.3.2. A small number of AAs naturally cross over the Buckinghamshire boundary, but 96% of the area covered by AAs (“the study area”) is within Bucks.

2.3.3. Figure 2.1 provides an overview of the defined AAs and Appendix 2 presents further discussion of the process.

2.3.4. Appendix 2 also presents detailed maps plus AAs can be interrogated via an interactive web map.

<sup>3</sup> Settlements not inset from the Green Belt are known as ‘washed over’ settlements.

<sup>4</sup> Also, development away from a settlement will inherently give rise to a risk of conflict with Green Belt Purpose C (Assist in safeguarding the countryside from encroachment) which, whilst not strictly a factor when defining grey belt, is not entirely ignored by the Green Belt PPG, as discussed in Section 7. Also, it is important to recognise that the impacts of development away from a settlement, both in terms of Green Belt purposes and NPPF footnote 7 constraint, will be very highly scheme dependent, such that it is reasonable to defer detailed consideration of impacts to further work as part of the local plan-making.

**Figure 2.1: Overview of the AAs**

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## 3. Classifying settlements

### 3.1. Introduction

- 3.1.1. Having defined AAs the next step is to assess the contribution of each AA to the relevant purposes of the Green Belt, which are:
  - A – Check the unrestricted sprawl of large built-up areas
  - B – Prevent neighbouring towns merging into one another
  - D – Preserve the setting and special character of historic towns
- 3.1.2. As such, as an initial step there is a need to define:
  - **Large built-up areas** (for Purpose A)
  - **Towns** (for Purpose B)
  - **Historic towns** (for Purpose D)
- 3.1.3. This is a key step as part of any GBA process, with little guidance and conflicting precedent. This being the case, there was **consultation** with neighbouring local authorities in early 2025, as discussed in Appendix 1.<sup>5</sup>
- 3.1.4. The three categories of settlement are discussed below.

### 3.2. Large built-up areas

- 3.2.1. There is no confirmed national definition of a large built-up area, and the matter of defining large built-up areas for GBA purposes has been a subject of debate over many years.<sup>6</sup> However, the PPG published in January 2025 potentially clarifies matters by stating: “*Villages should not be considered large built-up areas*”. This has been widely interpreted as an inference that all towns can be considered to be a large built-up area for GBA purposes.
- 3.2.2. However, distinguishing between towns and villages is itself fraught with difficulty, in that there is no agreed national approach. As such, the Buckinghamshire Settlement Hierarchy (2025), was taken as a starting point. This discusses four tiers of settlement:
  - Major urban areas – this tier comprises Aylesbury and High Wycombe and it is clearly the case that these are large built-up areas (although only High Wycombe is associated with the Green Belt).

<sup>5</sup> A meeting was held with the Southwest Hertfordshire authorities, and the Berkshire authorities provided a written response.

<sup>6</sup> For example, the [1955 circular](#) that first introduced Green Belts can be read as suggesting that it is only the one primary town / city / conurbation around which a Green Belt is defined that is a large built-up area, for example London. However, this definition is problematic because many Green Belts have been expanded over the years to encompass additional large towns or even cities, for example the London Green Belt was expanded to encompass Southend. Furthermore, it can be noted that the 1955 Circular also discusses the need to prevent any expansion of “towns and villages” beyond infilling or rounding-off. It can also be noted that the Office for National Statistics ([ONS](#)) defined a large built-up area as a settlement with a population greater than 75,000 for the 2021 census and previously defined a large built-up area as a settlement with a population about 500,000 for the 2011 census; however, there is no evidence that this step was taken with GBA settlement categorisation / terminology in mind. Finally, it can be noted that calculating the population size of any given settlement can be challenging and there is a need to consider many instances of settlements perhaps being technically distinct, in that there is a Green Belt gap, but having the sense of being somewhat merged, for example because of ‘washed over’ built form within the gap.

- Large market / other towns – the eight settlements in this tier are undoubtedly towns and so are also taken to be large built-up areas.
- Small market towns / other large settlements – there are 14 settlements in this tier, and it is debateable whether all can reasonably be considered a town. As such, settlements in this tier are not considered to be a large built-up area for the purposes of this GBA with one exception. Specifically, the exception is Great Missenden, which is considered a stand-alone settlement within the settlement hierarchy, but from a GBA perspective can be considered in combination with Prestwood, because the two settlements share a Green Belt inset boundary. The combined population of Great Missenden and Prestwood is sufficient to enable a conclusion that the combined settlement is a large built-up area.
- Larger villages – there are numerous settlements in this tier, and the settlements are not considered to be large built-up areas.

3.2.3. In summary, on the basis of the settlement hierarchy there are 11 towns within Buckinghamshire that can be considered to be a large built-up area; however, two of these can be screened out on the basis of not being associated with the Green Belt (Aylesbury and Buckingham), which leaves 9 towns / large built-up areas for consideration through this GBA.

3.2.4. In addition there are seven settlements outside of Buckinghamshire that are relevant to this GBA as a large built-up area, namely Berkhamsted, London, Leighton Buzzard; Maidenhead, Slough, Tring and Windsor.

3.2.5. As such, 16 large built-up areas are defined (in order of population size):

- London (outside of Buckinghamshire but the Green Belt inset boundary extends as far as New Denham, which is within Buckinghamshire)
- Slough (outside of Buckinghamshire but the Green Belt inset boundary extends as far as Burnham and Farnham Royal within Buckinghamshire)
- High Wycombe (includes linked/merged settlements such as Holmer Green, Penn, Loudwater, Wooburn Green and Booker)
- Maidenhead (outside of Buckinghamshire)
- Leighton Buzzard (outside of Buckinghamshire)
- Windsor (outside of Buckinghamshire)
- Chesham
- Chalfont St Peter and Gerrards Cross
- Berkhamsted (outside of Buckinghamshire)
- Amersham
- Marlow
- Beaconsfield
- Tring (outside of Buckinghamshire)

- Wendover
- Prestwood and Great Missenden
- Princes Risborough

3.2.6. A final consideration is then those settlements not listed above but where the gap to a nearby large built-up area is narrow, with this most notably the case for Bourne End / Wooburn (High Wycombe), Little Chalfont (Amersham), Farnham Common (Slough), Flackwell Heath (High Wycombe) and Marlow Bottom (Marlow). Similarly, in the case of the Ivers and Richings Park it is not unreasonable to argue that there is a sense of forming part of a large built-up area in combination with London and/or Slough, including accounting for the extent of built form washed over by the Green Belt. However, on balance it judged appropriate to conclude distinct settlements where there is a perceptible Green Belt gap.

### 3.3. Towns

3.3.1. There is no national definition of a town, with the [ONS](#) stating only that a population over 5,000 homes indicates a “larger village / small town”. It can be noted that nationally there are many examples of market towns with a population below 5,000, e.g. Watlington in Oxfordshire (under 3,000).

3.3.2. It is clear that defining a town (as with a large built-up area) requires consideration of more than a settlement’s population. As such, the Buckinghamshire Settlement Hierarchy (2025) was again drawn upon as a starting point and, specifically, the decision was taken to classify all of those settlements within the top three tiers of the hierarchy as a town. As discussed, it is debateable whether all of the settlements in Tier 3 are a town, but this was nonetheless considered to be a reasonable approach in the absence of clear guidance and given the context of the Green Belt purposes clearly differentiating between large built-up areas and towns.

3.3.3. Specifically, this means that ‘towns’ for the purposes of this GBA include: A) the 16 large built-up areas listed above; and B) eight further settlements that sit within Tier 3 of the settlement hierarchy and are associated with the Green Belt. Two other towns are then additionally defined, namely:

- Flackwell Heath – is classed as part of High Wycombe within the settlement hierarchy, but for GBA purposes is a separate settlement given a significant Green Belt gap. The population of Flackwell Heath is around 5,900 and there are two primary schools (and a college campus).
- Chorleywood – is the one settlement outside of Buckinghamshire that warrants being designated as a town (but not a large built-up area).<sup>7</sup>

3.3.4. The outcome is that 26 towns are defined, with these listed below in descending order of population size:

- London (also a large built-up area)

<sup>7</sup> Harefield and South Harefield are located in London Borough of Hillingdon and are not defined as a town on balance. The two villages technically share a Green Belt inset boundary, but the inset area that joins the two villages is extremely narrow.

- Slough (also a large built-up area)
- High Wycombe (also a large built-up area)
- Maidenhead (also a large built-up area)
- Leighton Buzzard (also a large built-up area)
- Windsor (also a large built-up area)
- Chesham (also a large built-up area)
- Chalfont St Peter and Gerrards Cross (also a large built-up area)
- Berkhamsted (also a large built-up area)
- Amersham (also a large built-up area)
- Marlow (also a large built-up area)
- Beaconsfield (also a large built-up area)
- Burnham (part of Slough large built-up area)
- Tring (also a large built-up area)
- Wendover (also a large built-up area)
- Prestwood and Great Missenden (also a large built-up area)
- Princes Risborough (also a large built-up area)
- Bourne End and Wooburn Town
- Little Chalfont
- Chorleywood
- Farnham Common / Farnham Royal (part of Slough large built-up area)
- Flackwell Heath
- Aston Clinton
- Chalfont St. Giles
- Stokenchurch
- Iver

## 3.4. Historic towns

3.4.1. There is understood to be a high bar to classifying any given town as a 'historic town' for the purposes of GBA, including noting the following statement made within the PPG:

*"Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose."*

- 3.4.2. Also, PAS Green Belt Guidance in 2015 provided observations on the matter as follows: *"This purpose is generally accepted as relating to very few settlements in practice. In most towns there already are more recent developments between the historic core... and the countryside."*
- 3.4.3. Nationally it is Bath, Cambridge, Oxford and York that are understood to be the prime examples of historic towns where Green Belt Purpose D applies.
- 3.4.4. On the other hand, the [Buckinghamshire Historic Towns Study \(2008\)](#) defined 13 historic towns in the study area, and this definition of a historic town in the Buckinghamshire context was used as the basis for defining historic towns in the previous Buckinghamshire GBA in 2016.
- 3.4.5. On balance, it was considered appropriate to define historic towns for the purposes of the current GBA on the basis of the 2008 study. However, there is a recognition that not all of the 13 historic towns from the 2008 study are of the same historic significance, and this must factor in.
- 3.4.6. Also, of the 13 historic towns defined by the study, two are villages, namely Denham and Ivinghoe, such that they need not be considered further here.<sup>8</sup> This leaves 11 historic towns defined by the 2008 study.
- 3.4.7. However, one further settlement for consideration is Chalfont St. Giles, which was considered as a historic town in the 2016 GBA despite not being a focus of the 2008 Buckinghamshire Historic Towns Study.<sup>9</sup> Chalfont St. Giles is considered a town for the purposes of this current GBA, as discussed above, and is clearly highly significant in historic environment terms, and so it is considered appropriate to classify it as a historic town.
- 3.4.8. This leads to a shortlist of 12 historic towns. However, High Wycombe can then be screened out because, whilst High Wycombe is a valued historic town, its historic core is distant from the Green Belt such that there is no potential to conclude that the Green Belt surrounding High Wycombe makes any notable contribution to Purpose D.<sup>10</sup>
- 3.4.9. Also, whilst Chalfont St. Peter and Gerrards Cross are considered as separate settlements by the 2008 Study they are now considered to form a single town for the purposes of this current GBA. As such, there are 10 historic towns within Buckinghamshire for detailed assessment.<sup>11</sup>
- 3.4.10. The final question is in respect of those towns defined in Section 3.3 that fall outside of Buckinghamshire, and, in summary, none are defined as a historic town for the purposes of this GBA. Points to note are as follows:

<sup>8</sup> They are considered in the study because they have had the characteristics of a town at points in their history but are now clearly villages, and the PPG is clear that: *"This purpose relates to historic towns, not villages".*

<sup>9</sup> Presumably it was not considered by the 2008 Study as it historically had the characteristics of a village rather than a town.

<sup>10</sup> It is also recognised that there are highly significant historic environment constraints at numerous points around the edge of the High Wycombe large built-up area, but these relate to historic villages rather than High Wycombe as a historic town.

<sup>11</sup> For completeness, the towns within Buckinghamshire defined within Section 3.3 that are not assessed further as a historic town are: Aston Clinton (there is no central conservation area, and historic assets are distant from the Green Belt, albeit views from the Chilterns escarpment are a factor); Bourne End / Wooburn (whilst there are settlement edge conservation areas there is no central historic core); Farnham Common / Farnham Royal (historically these were villages with nearby Burnham a more significant settlement); High Wycombe (as discussed); Iver (historically a significant village, but not as significant as Chalfont St. Giles); Little Chalfont (the settlement is mostly 20<sup>th</sup> century in origin and there is no conservation area); and Stokenchurch (the conservation area includes few listed buildings and is separated from the Green Belt by modern development).

- London – there is limited historic environment constraint along much of the border between Buckinghamshire and London and, overall, there is not considered to be any settlement that qualifies as a historic town.
- Slough – is not considered to qualify as a historic town (which is not to say that there is not wide ranging historic interest).
- Maidenhead – might qualify as a historic town, but there is a low density of designated assets in the town centre (on account of 20<sup>th</sup> century development), and the town centre is some distance from the Buckinghamshire Green Belt. The issue, therefore, is how to account for riverside area of Maidenhead, which is highly valued in historic environment terms, including on account of the grade 1 listed road bridge and the grade 1 listed railway bridge. As part of this, it is noted that there is a conservation area adjacent to the river that falls within Buckinghamshire, but this conservation area is associated with Taplow as much or more so than Maidenhead (it is called the Taplow Riverside Conservation Area). On balance it is not considered necessary to engage Purpose D for Maidenhead as part of this current GBA. It can also be noted that the area in question is heavily affected by flood risk.
- Leighton Buzzard – the historic core is 1.5km from the Buckinghamshire Green Belt and separated by extensive modern built form.
- Windsor – is a highly significant historic town but the historic core is distant from Buckinghamshire. It is recognised that there is a need to factor in connectivity via the River Thames corridor and visual links between higher ground in Buckinghamshire and Windsor Castle; however: A) land along the river corridor is heavily affected by flood risk; and B) views of the Castle from Buckinghamshire are limited and at a long distance and, whilst a clear sensitivity, are not considered to translate into a significant concern regarding preserving the setting and special character of Windsor as a historic town. For these reasons Windsor is not considered further here as a historic town.
- Berkhamsted – is a historic town but the Buckinghamshire Green Belt is around 1,600m distant from the historic core and there is little or no visual connectivity, noting topography and a large woodland. As such, Berkhamsted is not considered further here as a historic town.
- Tring – has been a market town since the medieval period and has a valued historic core. However, the Buckinghamshire Green Belt is around 1,200m distant from the historic core and this part of the Green Belt comprises low lying land which limits visual connectivity. As such, Tring is not considered further here as a historic town.
- Chorleywood – is shown on [historic mapping](#) as modest settlement around a common, in a similar fashion to Gerrards Cross. The distinction though is that conservation areas at Gerrards Cross relate closely to the Green Belt, whilst conservation areas at Chorleywood are separated from the Buckinghamshire Green Belt.

3.4.11. In summary, the defined historic towns are (in alphabetical order):

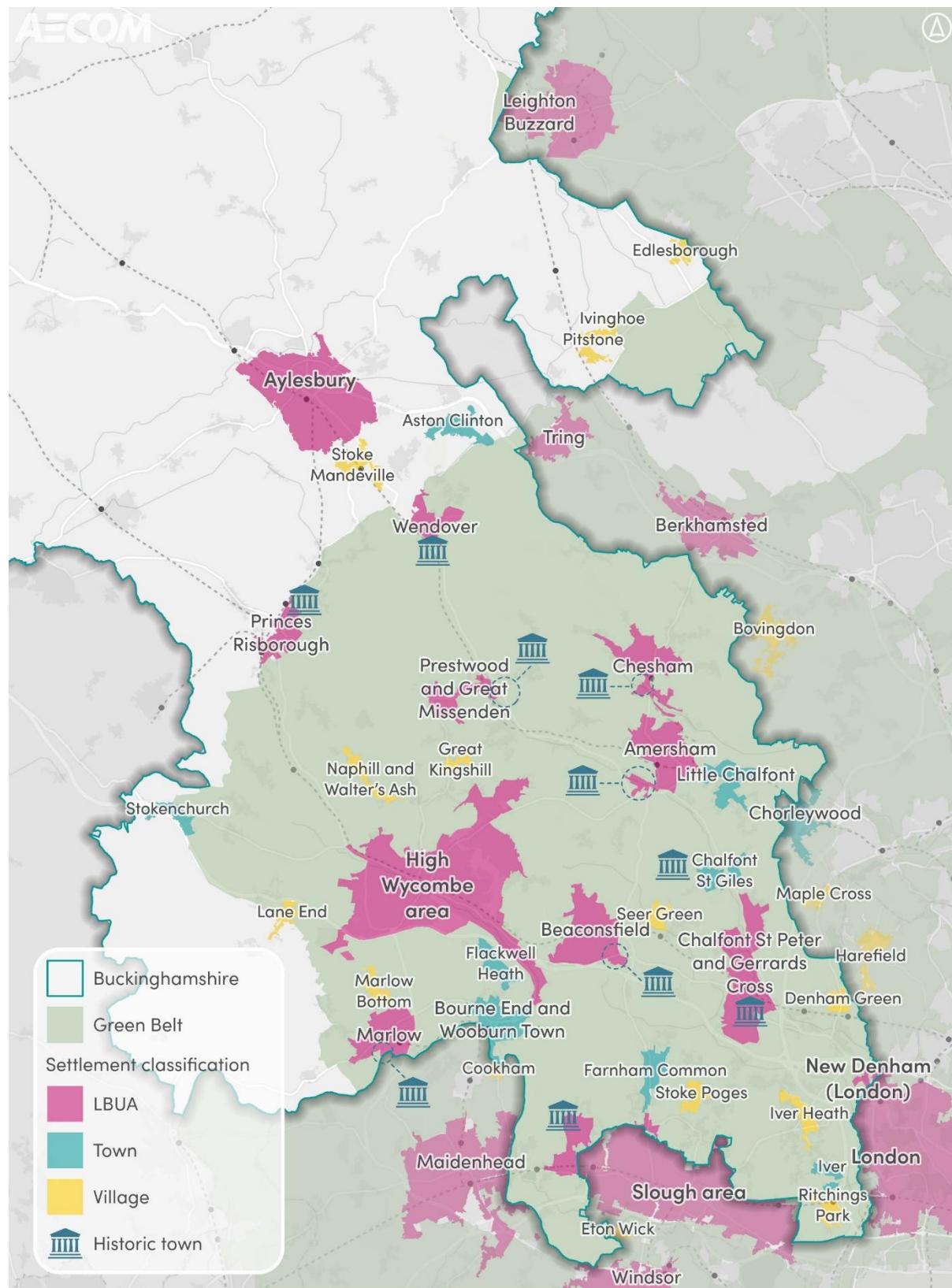
- Amersham
- Burnham
- Beaconsfield
- Chalfont St. Giles
- Chalfont St Peter and Gerrards Cross
- Chesham
- Marlow
- Prestwood and Great Missenden
- Princes Risborough
- Wendover

3.4.12. Finally, it is important to be clear that within each of these towns attention focuses on their 'historic cores' for the purposes of assessing the contribution that nearby Green Belt AAs make to Purpose D. Other than the historic cores there may be wider historic interest, and this can factor in as an NPPF footnote 7 constraint but does not warrant being a focus of Purpose D assessment. This notably applies to both Beaconsfield and Amersham, where attention focuses on their 'Old Towns' as part of Purpose D assessment more so than the wider parts of the town despite heritage value in these areas (including 20<sup>th</sup> century heritage relating to Metroland).

## 3.5. Conclusion on settlement classification

3.5.1. Figure 3.1 shows the final settlement classification. N.B. villages shown are only those 'inset' from the Green Belt as opposed to 'washed over'.

**Figure 3.1: Settlements classified for the purposes of GBA**



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## 4. Purposes assessment

### 4.1. Introduction

- 4.1.1. Having identified AAs (Section 2) and classified settlements for the purposes of assessing their contribution to the relevant Green Belt purposes (Section 3) the next step was to assess each AA in terms of its contribution to the relevant Green Belt purposes.
- 4.1.2. To reiterate, the three relevant purposes are:
  - A – Check the unrestricted sprawl of large built-up areas
  - B – Prevent neighbouring towns merging into one another
  - D – Preserve the setting and special character of historic towns
- 4.1.3. For each of the relevant purposes the PPG presents criteria (Table 4.1) that must be applied before reaching a conclusion on whether the contribution of each AA is: **Strong**; **Moderate**; or **‘Weak or none’**.
- 4.1.4. Each of the purposes is discussed in turn below, before a final section presents conclusions.

### 4.2. Purpose A

- 4.2.1. The PPG requires that each AA is categorised as ‘strong’, ‘moderate’ or ‘weak or none’ on the basis of the following criteria (emphasis added):
  - Strong – likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: be adjacent or near to a large built up area; if developed, result in **an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)**
  - Moderate – likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): having physical feature(s) in reasonable proximity that could restrict and contain development; **be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development**; contain existing development; being subject to other urbanising influences.
  - Weak or none – likely to include those that: are not adjacent to or near to a large built up area; are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development.

4.2.2. Beginning with AAs where contribution to Purpose A is **none**, this is the conclusion for 414 AAs that are not adjacent to a large built up area. The focus of detailed assessment is on AAs adjacent to a large built up area on the basis that AAs not adjacent will always be incongruous in the context of the nearby large built up area. Also, many of the AAs not adjacent to a large built up area are large such that they extend out some distance.<sup>12</sup>

4.2.3. With regards to AAs that make a **weak** contribution, the PPG is clear that this must be the overall conclusion where there is either significant onsite built form or the AA is strongly enclosed by existing development. Only 31 AAs meet one or both of these criteria such that contribution is weak.

4.2.4. This leaves 363 AAs where detailed assessment aims to classify overall contribution as either **moderate** or **strong**. In this regard the PPG is clear that an overall conclusion of strong requires four criteria to all have been met, or, in other words, the overall conclusion must be moderate if any of the four criteria are failed. The criteria (as interpreted) are:

- **Onsite built form** – the majority of AAs have some onsite built form such that a judgement is required as to whether built form is such that this criteria is failed, including accounting for built form not inappropriate in the Green Belt. Putting aside AAs where overall contribution is weak, a total of 167 AAs have “limited” onsite built form, and of these:
  - For 9 AAs the onsite built form dictates a conclusion of moderate.
  - For 20 AAs the onsite built form is accounted for alongside weaknesses under other criteria leading to a conclusion of moderate.
  - For 87 AAs the matter of onsite built form is not consequential, because the AA fails one or more of the other three criteria.
  - For 51 AAs the ultimate conclusion is strong because the onsite built form is sufficiently limited (and the other three criteria are passed).
- **Incongruity** – an incongruous development is one not in keeping with the settlement, and the PPG provides two examples: 1) an AA that is not partially enclosed;<sup>13</sup> and 2) an extended finger projecting outwards. The issue is that many AAs fall in between these examples, in that they are neither partially enclosed nor in the form of an extended finger; hence, for many AAs, there is a need to apply judgement.

Putting aside AAs where overall contribution is weak, 89 AAs are “partially enclosed” such that contribution to Purpose A is moderate, which then leaves 274 that are not partially enclosed. Of these:

- For 73 AAs development would not be incongruous (sometimes “on balance”) which then dictates a conclusion of moderate.
- For 26 AAs a view that, on balance, development would not be incongruous is accounted for alongside weaknesses under one or more of the other criteria leading to a conclusion of moderate.

<sup>12</sup> Whether an AA is adjacent to a large built-up area is indicated by the reference number in the vast majority of cases, for example AAs beginning with “HW” are adjacent to High Wycombe. However, additionally 19 AAs with a reference number that does not relate to a large built-up area are also considered to be suitably adjacent to warrant detailed consideration in respect of Purpose A; for example, this is the case for one AA adjacent to Stoke Poges (SP005) because it is also adjacent to Slough.

<sup>13</sup> It follows that ‘rounding-off’ involves a congruous form of development, with this term used in the 1955 Green Belt [Circular](#).

- For 12 AAs the question of whether development would be incongruous is not consequential, because the AA fails one of the other three criteria.
- In 149 instances the ultimate conclusion is strong because development would be incongruous (sometimes “on balance”) and the other three criteria are passed.
- **Containment** – many AAs will have a variety of boundary features and there is considered to be a high bar in respect of judging strong containment on all sides such that this criteria is failed. In the [Marlow Film Studios](#) decision, for example, it is noted that the Secretary of State concludes that A-roads to the west and north are strong containing features but not a tree lined driveway to the east nor the River Thames flood zone to the south. However, the bar is lowered (and the task of reaching a conclusion on containment made more challenging) by the reference within the PPG to accounting not only for the boundaries of the AA itself but also boundaries “in reasonable proximity” to the AA.

Ultimately, only 9 AAs are recorded as having “strong containment” such that this criteria is failed and contribution is moderate. Also, in 16 instances containment is accounted for alongside weaknesses under one or more of the other criteria leading to a conclusion of moderate.

- **Urbanising influences** – there is considered to be quite a high bar in respect of judging that urbanising influences are such that this criteria is failed, including again noting Marlow Film Studios, where the Secretary of State does not refer to the adjacent A-roads as urbanising influences. Ultimately, only 2 AAs are recorded as having a “strong urbanising influence” such that this criteria is failed. Also, in 13 instances urbanising influences are accounted for alongside weaknesses under one or more of the other criteria leading to a conclusion of moderate.

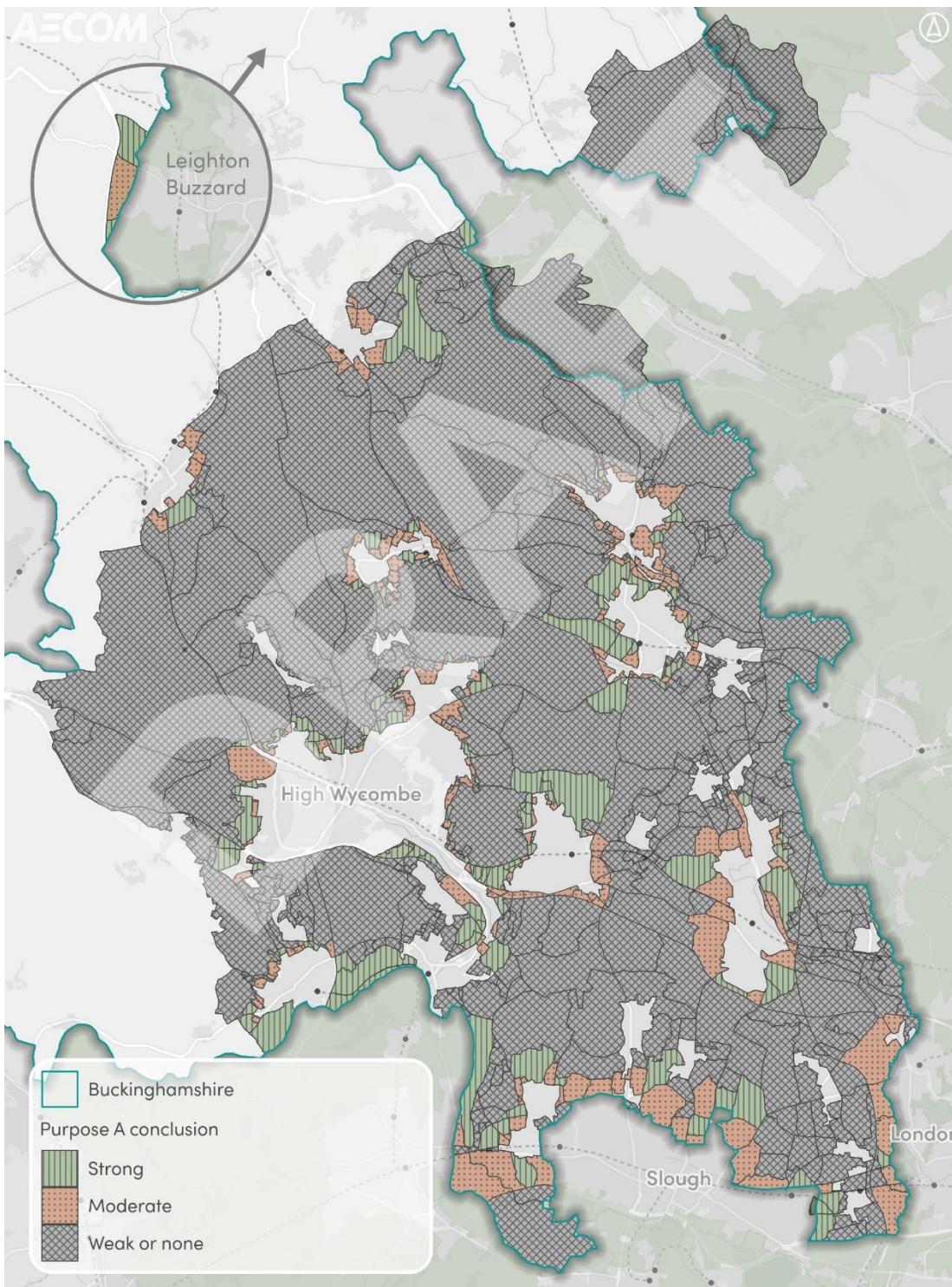
4.2.5. Finally, it should be noted that in 32 instances contribution to Purpose A is judged to be strong because the AA comprises a significant woodland that marks the settlement edge. This is on the basis that: A) development of a significant settlement-edge woodland will typically be incongruous; B) there will typically be few concerns regarding onsite built form or urbanising influences; and C) it is difficult to suggest strong containment, given that the woodland itself should act as a strong containing feature.

4.2.6. The **outcome** is that 149 AAs are judged to make a strong contribution to Purpose A such that they are not grey belt, whilst the remaining 659 AAs do not make a strong contribution such that they ‘can be grey belt’ subject to further considerations discussed below.

4.2.7. As a final point, it can also be noted that in numerous instances of an overall contribution of ‘strong’ it is the case that concerns around an incongruous form of development would be reduced were the AA to be considered in combination with adjacent AAs. This is on the basis that a larger but more rounded form of development would not be incongruous and/or because a larger scheme could draw upon strong boundaries.

**Table 4.1: Purpose A assessment findings**

Purpose A contribution	Implication for grey belt	Number of AAs
Strong	Not grey belt	149
Moderate	Can be grey belt	214
Weak or none	Can be grey belt	445

**Figure 4.1: Purpose A assessment findings**

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## 4.3. Purpose B

4.3.1. The PPG requires that each AA is categorised as ‘strong’, ‘moderate’ or ‘weak or none’ on the basis of the following criteria (emphasis added):

- Strong – likely to be free of existing development and include all of the following features: forming a substantial part of a gap between towns; the development of which would be likely to result in the **loss of visual separation** of towns.
- Moderate – likely to be located in a gap between towns but include one or more features that weaken their contribution to this purpose, such as (but not limited to): forming a small part of the gap between towns; being able to be developed **without the loss of visual separation** between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation.
- Weak or none – likely to include those that: do not form part of a gap between towns, or form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation.

4.3.2. As an initial point, it can be noted that assessing Purpose B is challenging on account of there being many gaps for consideration in between the 26 towns listed above. For example, for High Wycombe there is a need to consider gaps to 8 other towns. Also, a complicating factor is that numerous AAs make a notable contribution to more than one gap.

4.3.3. This being the case, there was a need to take a proportionate approach to differentiating between AAs that make **weak** contribution versus those where the contribution can be said to be **none**. 125 AAs are assigned ‘weak’ because there is a contribution, whilst 450 AAs are assigned ‘none’ because there is “no notable contribution”, but it is acknowledged that a small contribution could potentially be noted for some of the latter AAs.

4.3.4. Having identified 575 AAs where contribution is either weak or none, the task for the remaining 233 AAs is classify contribution as either **moderate** or **strong**. As part of this, the primary consideration is “loss of visual separation”, but this is a challenging criterion, because:

- It is unclear whether “loss” means: A) partial loss (i.e. such that towns merge, recalling that Purpose B deals with the merging of towns); or B) a partial but significant loss (recalling that the criteria imply a need to maintain a “substantial” gap as opposed to any form of gap).
- It is unclear how to factor in visual *connectivity* when considering visual *separation*. Specifically, there can be instances where there is technically visual connectivity on the basis of long distance views to or from a high point (e.g. a church spire or a modern tall building) but still substantial visual separation from other viewpoints. Also, visual connectivity is difficult to judge through a strategic GBA, with this more a matter for consideration at the project level informed by detailed field work (e.g. with access to private land and work to account for building heights and highly variable screening by trees/hedgerows).

- It is unclear how to account for the fact that separation between settlements is strongly experienced from movement corridors, which primarily means roads (and main roads in particular) and railway lines (albeit recognising that views from railway lines are often restricted). There will often be instances of there being clear visual separation between settlements, and there being a lack of visual connectivity in the strictest sense, but a concern regarding a perceived loss of separation along a movement corridor; for example, such that the residual sense of separation experienced by motorists is only ‘ fleeting ’.
- Related to this, there is also the matter of intervening built form between towns (which might be inset from the Green Belt or washed over), which reduces the sense of settlement separation and so increases concerns around development leading to a perceived loss of separation.
- Finally, there is a need to balance a focus on individual AAs leading to merging / loss of separation with a need to consider the long term risk of merging where a remaining gap would be distinctly ‘ fragile ’. This is in light of NPPF paragraph 142, which explains that *“the essential characteristics of Green Belts are their openness and their permanence.”*

4.3.5. Ultimately, 55 AAs are judged to make a strong contribution, covering a total of 4,933 ha, whilst 178 AAs are judged to make a moderate contribution, covering a total of 29,473 ha.

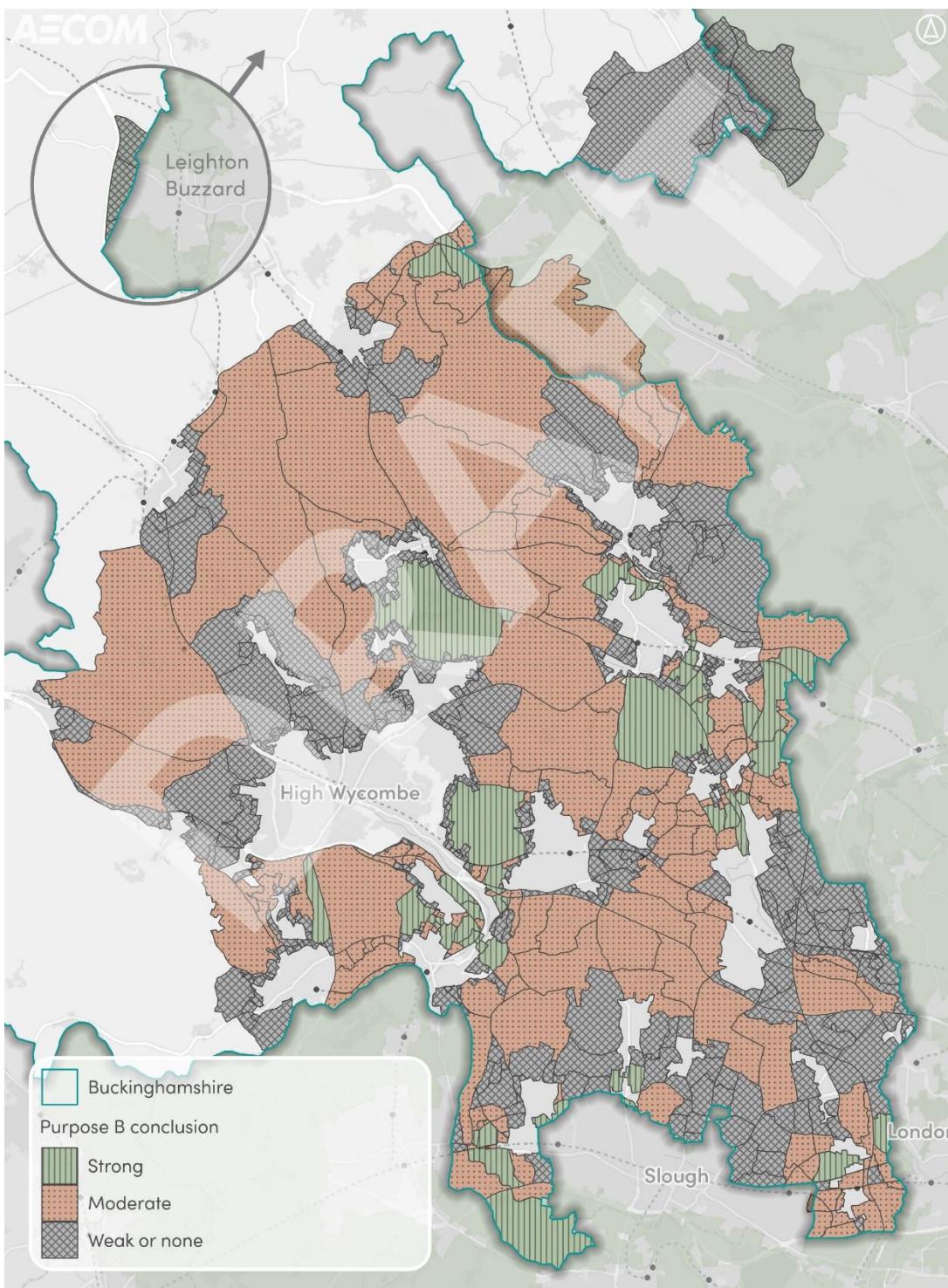
4.3.6. Final points to note are as follows:

- There are 17 gaps in total that are evidently sensitive as evidenced by one or more AAs being judged to make a strong contribution.
- There are three further gaps (between towns) of note in that they are sensitive notwithstanding the inability to conclude ‘ strong ’ for any of the associated AAs, namely: 1) Beaconsfield to Gerrards Cross; 2) Gerrards Cross / Chalfont St. Peter to London; and 3) Slough to London.
- Whilst there must be a focus on assessing AAs in isolation, there is an acknowledgement that concerns regarding impacts to settlement gaps would increase significantly were AAs to be considered in combination. See further discussion of in-combination concerns in Section 7.
- The total area of AAs making a moderate contribution is very high on account of this being the conclusion reached for numerous very large AAs in between settlements (specifically, AAs that are very large on account of not being located adjacent to a settlement). When assessing very large AAs it is reasonable, in light the PPG criteria, to account for the “ presence ” of onsite features / characteristics (including National Landscape designation) that would likely restrict development or otherwise help to maintain substantial settlement separation.

4.3.7. In conclusion, the **outcome** is that 55 AAs are judged to make a strong contribution to Purpose A such that they are not grey belt, whilst the remaining 753 AAs do not make a strong contribution such that they ‘ can be grey belt ’ subject to Purpose A and further considerations below.

**Table 4.2: Purpose B assessment findings**

Purpose B contribution	Implication for grey belt	Number of AAs
Strong	Not grey belt	55
Moderate	Can be grey belt	178
Weak or none	Can be grey belt	575

**Figure 4.2: Purpose B assessment findings**

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## 4.4. Purpose D

### Introduction

4.4.1. This section is structured as follows:

- Overview
- A discussion of each of the historic towns in turn
- Summary outcomes

### Overview

4.4.2. The PPG requires that each AA is categorised as 'strong', 'moderate' or 'weak or none' on the basis of the following criteria (emphasis added):

- Strong – likely to be free of existing development and to include all of the following features: form part of the setting of the historic town; **make a considerable contribution to the special character of a historic town**. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects...
- Moderate – likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): being separated to some extent from historic aspects of the town by existing development or topography; containing existing development; not having an important **visual, physical, or experiential relationship** to historic aspects of the town
- Weak or none – likely to include those that: do not form part of the setting of a historic town; have no visual, physical, or experiential connection to the historic aspects of the town.

4.4.3. Beginning with AAs where contribution to Purpose A is **none**, this is the conclusion for 736 AAs that are not strongly associated with the historic aspects of one of the defined historic towns. 28 AAs are then assigned **weak**; however, and as per the discussion above for Purpose B, a proportionate approach has been taken to differentiating AAs that make a 'weak' contribution from those that make a contribution of 'none'.

4.4.4. This leaves 44 AAs where detailed assessment aims to classify overall contribution as either **moderate** or **strong**. As part of this, a key methodological point to note is that there is considered to be a high bar to concluding a strong contribution where it is the case that the definition of a settlement as a historic town is marginal, or its significance as a historic town is limited. In practice, the significance of the ten identified historic towns does vary considerably, with Amersham, Beaconsfield and Marlow standing out as large historic market towns of larger-than-local renown.<sup>14</sup>

<sup>14</sup> It can be noted that the 2016 Buckinghamshire GBA assessed AAs on a three point scale and did not assign the top score to any AA, presumably accounting for the limited significance of the historic towns in question.

4.4.5. Ultimately, the conclusion is that 17 AAs make a strong contribution, with these AAs located at: Amersham (4 AAs); Beaconsfield (1 AA); Burnham (1 AA); Chalfont St. Giles (3 AAs); Chesham (4 AAs); Marlow (1 AA); Prestwood / Great Missenden (1 AA); and Wendover (2 AAs).

4.4.6. Presented below is an overview discussion for each of the historic towns.

4.4.7. Finally, note that, in addition to the Buckinghamshire Historic Towns Study, a key resource is: <https://local-heritage-list.org.uk/buckinghamshire/map>. Here all nationally designated assets are mapped alongside locally designated assets (each with a description) and there are two historic basemaps available. Historic maps are also available [here](#).

## Purpose D at Amersham

4.4.8. The focus is on the Amersham Conservation Area which specifically covers 'Old Amersham', namely that part of Amersham along the Misbourne Valley that predates 'Amersham-on-the-Hill' (which was developed in the early 20<sup>th</sup> century as part of Metroland). Old Amersham is of clear larger-than-local renown and is a visitor destination. There is a very high density of listed buildings including one that is grade 1 listed and seven that are grade 2\* listed. There is a museum, including relating to the Amersham Martyrs, and a bypass means that there is little traffic along the High Street.

4.4.9. Taking sectors around the conservation area in turn:

- Northeast – this is the most sensitive sector both within this sub-area and within the study area as a whole. From important footpaths there are clear views of Old Amersham and the valley / hills beyond and with the church very prominent.<sup>15</sup> Equally, these fields, as well as Parsonage Wood, are part of the backdrop to views from the opposite side of the valley. Given the significance of Old Amersham as a historic market town this sector of land is judged to make a strong contribution.
- North – the fields to the west of Rectory Lane are less accessible, and there are limited views from the one footpath through this area because it follows a valley. However, the footpath is nonetheless important as a link to/from Old Amersham and, regardless, this sector of land comprises the very steep valley side adjacent to Old Amersham and is a key part of the backdrop from the opposite side of the valley. This sector of land is judged to make a strong contribution.
- Northwest – this area is less sensitive, including given: A) distance to the conservation area and listed buildings within it; B) a valley such that much of this land is relatively low lying; and C) notably low accessibility (although the possibility of this changing might be envisaged, noting that signs advertise that the land is largely managed as a "conservation area"). This land is strongly associated with the Misbourne Valley in proximity to Old Amersham, and that part most distant forms part of Shardeloes Registered Park and Garden. However, accounting for the distance to the main historic core it makes a moderate contribution.

<sup>15</sup> The footpaths link Old Amersham to the underground station at Amersham on the Hill, but also the footpaths form what is likely a popular circular route taking in Old Amersham and also the Martyrs Memorial.

- West – a small AA here is strongly associated with the river corridor and does partly intersect the conservation area, although there is only one listed building in the vicinity. There is historic character, with the built form having changed little from that shown on historic mapping, although the nearby A413 is an urbanising influence. The land is not highly accessible by public right of way, but it is noted that the farm here has diversified and currently operates a nursery and a children's petting farm. On balance this AA is judged to make a strong contribution to Purpose D.
- Southwest beyond the bypass – this sector of land is strongly associated with Shadeloes Grade 2\* Registered Park and Garden. There are limited views of Old Amersham from footpaths, but Shadeloes Farm and nearby woodlands (which fall outside of the Registered Park and Garden and are not accessible) are associated with a high point and form part of the background to views across Old Amersham from the opposite side of the valley. Given distance to the core of Old Amersham and the intervening Amersham bypass (A413) this sector makes a moderate contribution.
- South within the bypass – whilst not all land here is accessible, and much of the area is not actively farmed such that it is overgrown scrubland, there is a network of footpaths through this area that contribute to appreciation of the Old Town. From both of the sectors here – west and east of Whielden Street – there are distinct (albeit brief) close distance views of the Church as well as well as nearby assets relating to the hospital / former workhouse.<sup>16</sup> There are also views of the water tower at Coleshill.<sup>17</sup> However, there is also the influence of modern built form and infrastructure. These AAs make a moderate contribution.
- South beyond the bypass – this is the location of Gore Hill and the A355, from which there are impressive views towards and across Old Amersham on the approach from Beaconsfield. This land also contributes strongly to the back drop to Old Amersham from the opposite side of the valley. However, given distance to the core of Old Amersham, separation by the bypass and more generally the influence of major roads infrastructure, this sector is judged to make only a moderate contribution.
- East – this is the approach to Old Amersham from the Chalfonts along the A413, which is a road strongly associated with the Misbourne Valley. Also the South Bucks Way passes through this area, there are two important clusters of listed buildings; and raised land in this sector does contribute somewhat to views across Old Amersham from the opposite side of the valley. However, there is extensive modern development including large scale commercial development, plus there is the influence of significant infrastructure. On balance, only the AA closest to Old Amersham (which mostly comprises listed buildings) makes a moderate contribution.

<sup>16</sup> <https://visitamersham.org.uk/business/gilbert-scott-court-workhouse/>

<sup>17</sup> <https://amershammuseum.org/history/trades-industries/coleshill-water-tower/>

## Purpose D at Beaconsfield

4.4.10. The focus is on the Beaconsfield Old Town at the far southeast of the town, with the wider part of the town largely associated with the New Town which was developed as part of Metroland in the early 20<sup>th</sup> century. Beaconsfield Old Town is also of considerable renown and is a visitor destination. There is a broad market street, similar to at Old Amersham, and Beaconsfield was historically an important staging post along the London to Oxford Road (the A40). However, significance is potentially not quite on a par Old Amersham – including as indicated by fewer grade II\* listed buildings and no grade I listed – and its ties to the surrounding landscape are certainly not as strong.

4.4.11. Taking sectors around the conservation area in turn:

- Southwest – the AA comprising Hall Barn registered park and garden (grade II\*) can clearly be judged to make a strong contribution to Purpose D. However, this is less the case for the AA located adjacent to south of the A40 on the approach to the Old Town from the west. On the one hand the A40 is a historic coaching road that relates to the historic significance of Beaconsfield, and the approach to the Old Town along the A40 is associated with a distinct hill. Also, there are two prominent listed buildings. However, on the other hand, a petrol station is an urbanising influence, as is the A40 and nearby M40, and the AA is not accessible or easily appreciated. On balance the AA makes a moderate contribution.
- Southeast – there is a distinction between Beaconsfield Rugby Club, which abuts the conservation area, and the wider area of land to the east. The AA comprising the Rugby club abuts an entrance to and the boundary wall of Hall Barn, but the Rugby club itself is a detracting feature. As for the wider parcel of land to the east, whilst there are some historical associations including a locally listed farm and the former lane to Hedgerley, and these AAs can be appreciated as part of a short circular walk that also takes in the Old Town, there are limited visual links to Old Town. All three of the AAs are judged to make a moderate contribution.
- Northeast – this sector of land links to the periphery of the conservation area and is influenced by modern development and infrastructure. The question is whether contribution is moderate or weak, but on balance both AA make a moderate contribution.

## Purpose D at Burnham

4.4.12. Burnham's designation as a historic town is somewhat marginal, with the Buckinghamshire Historic Towns Study (2008) explaining: "... *Burnham is today rightly regarded as no more than a large village which expanded in the 20th century. However examination of its early history shows that it once had pretensions to be a market town.*"

4.4.13. In practice there is only one Green Belt parcel strongly associated with the historic core, which significantly intersects the conservation area and so makes a strong contribution. A further area to the east does include a series of listed buildings, but there are limited links to the historic core and so, on balance, it is judged to make a weak contribution to Purpose D.

## Purpose D at Chalfont St. Giles

4.4.14. As discussed, the designation of Chalfont St. Giles as a historic town is clearly marginal on the basis that it is not identified as a historic town within the Buckinghamshire Historic Towns Study (2008), presumably on the basis that it historically had the characteristics of a village. However, on the other hand, Chalfont St. Giles is of larger-than-local renown for its historic significance, with a 'picture postcard' village centre that has changed little over the centuries; a prominent Grade 1 listed church adjacent to the River Misbourne corridor along which runs the Chiltern Way / South Bucks Way; and a historical association with John Milton, for whom there is a museum.

4.4.15. In summary, the findings of the assessment are as follows:

- One AA within the conservation area makes a strong contribution.
- Two AAs adjacent to the conservation area and comprising key sectors of the River Misbourne corridor make a strong contribution.
- An AA along the River Misbourne to the north of the village (more distant from the church) makes a moderate contribution on balance.
- Three further AAs to the north make a moderate contribution. These are separated by the AA, including by the A413 in two instances (but these latter two AAs do comprise a locally listed park/garden).

## Purpose D at Chalfont St. Peter / Gerrards Cross

4.4.16. Within the historic core of Chalfont St. Peter there are only six listed buildings and there is not a designated conservation area. Within Gerrards Cross there are four extensive conservation areas, but these are associated with a very low density of listed buildings, reflecting Gerrards Cross's historic form being that of dispersed settlement surrounding common land. Whilst Gerrards Cross is identified as a historic town, this is largely on account of its development in the 20<sup>th</sup> century, which must factor in.<sup>18</sup>

4.4.17. Taking select sectors around the settlements in turn:

- North of Chalfont St. Peter – there is a strong influence of modern built form and infrastructure, and it is important to recall the limited significance of Chalfont St. Peter's historic core. Contribution is weak.
- West of Gerrards Cross – the sectors of land either side of the A40 do link closely to conservation area, but there is a need to recall the limited significance of Gerrards Cross as a historic town. On balance only the AA to the south, which comprises a grade 2\* registered park and garden, is judged to make a moderate contribution.

<sup>18</sup> The Historic Towns Study explains [emphasis added]: "It was not until 1861 that Gerrards Cross was properly recognised as a separate place when a new parish was carved out from five neighbouring parishes. However the real catalyst for the creation of a town was the arrival in 1906 of the Great Western & Great Central Joint Railway line... To exploit its position on the railway, district planners and developers set about the creation of a purpose built 'garden suburb', a residential town made up of large arts and crafts style houses with spacious gardens. The development of Gerrards Cross was characterised by its high status housing designed by many famous architects, including Stanley Hamp and Robert Muir... A dormitory town for middle class commuters to London, Gerrards Cross is regarded as one of the more exclusive places to live in Buckinghamshire and in spite of its relatively short history is arguably one of the finest examples of an early twentieth century suburban town in England." It can also be noted that there is a very high density of locally listed buildings within Gerrards Cross.

- East of Gerrards Cross – whilst there are links to the conservation areas, there are few listed buildings and there is the influence modern development and infrastructure. Recalling the limited significance of Gerrards Cross as a historic town these AAs make a weak contribution.

## Purpose D at Chesham

4.4.18. The focus is on the Chesham Conservation Area, which is located at the southwest extent of the town and strongly associated with the Chess Valley. Within the conservation area there is a clear distinction between land to the west of the A416, where all of the higher grade listed buildings are to be found, and land to the east of the A416 where the conservation area intersects the town's main high street and whilst there is a high density of listed buildings these are appreciated in the context of modern built form.

4.4.19. This is not a visitor destination in the same way as Old Amersham and Old Beaconsfield, including as the part of the conservation area to the west of the A416 (the Old Town) is not easily accessed. However, it is nonetheless highly significant, and the Old Town is something of a 'hidden gem'. The conservation area as a whole is also notably the start/finish point for the Chess Valley Walk between underground stations.

4.4.20. Taking sectors around the conservation area in turn:

- West – all of the adjacent AAs either intersect or are closely associated with the conservation area. To the south this is a stream corridor and appreciated as such form the B485, albeit there are no public rights of way in this area. To the north is a historic park (there is also a scheduled monument) on steeply rising land near adjacent to the grade 1 listed church. These AAs make a strong contribution.

Finally, with regards to the two large non-adjacent AAs, these are associated with characteristic valleys and ridges, and an associated network of lanes and public rights of way. They are near adjacent to the conservation area, and whilst there may be limited visual connectivity there is likely a strong sense of connectivity, noting little change to the landscape over the past 120 plus years (see [historic mapping](#)). There is a distinction between the northern AA that is in proximity to the church and includes a locally listed [park/garden](#), and the southern AAs that is separated from the main core of the conservation area. On balance both are judged to make a moderate contribution.

- East – this is an important high point (within the National Landscape) from where there are extensive views of Chesham's 20<sup>th</sup> century suburbs extending out to the north and east. However, there is very limited visual connectivity with the conservation area in the valley directly below the key viewpoints. There is a view of the Church steeple, but this is a glimpsed view (on account of a hedgerow being deliberately trimmed to allow for the view). Walking connectivity to the conservation area involves crossing the railway line, and this is the High Street part of the conservation area as opposed to the 'Old Town'. This land is judged to make a moderate contribution.

## Purpose D at Great Missenden

4.4.21. The focus is on the Great Missenden Conservation Area, which is located at the eastern extent of 'Prestwood and Great Missenden' (considered as a combined settlement for the purposes of this GBA). In some ways this is a traditional village high street conservation area; however, considerable added significance comes from its associations with Roald Dahl, and the Roald Dahl Museum is an important visitor attraction. Also, the significance of the conservation area is strongly associated with its landscape setting, namely a setting within the Misbourne Valley, although the A413 bypass is nearby and is a detracting feature (more so than at Old Amersham).

4.5. Taking sectors around the conservation area in turn:

- Southeast – land to the west of the A413 comprising the conservation area and Missenden Abbey clearly makes a very strong contribution to the significance of Great Missenden. The conservation area and registered park and garden also extends to the east of the A413, and this is the location of the grade I listed church that, whilst separated from the abbey grounds and high street by the A413, is easily accessed and appreciated. This latter area makes a moderate contribution.
- Northeast – is less sensitive, including as this northern part of the conservation area is less sensitive, but the Misbourne Valley is connecting feature, including noting the South Bucks Way. There are very limited views of historic built form the river corridor here (what is most prominent is a development of flats from the circa 1960s) but there is a sense of time depth associated with historic riverside meadows. This area makes a moderate contribution to Purpose D.
- West – this is the rising land of the valley side but there is very limited visual connectivity with the conservation area. There are also limited concerns regarding views from the other side of the valley. As such, this land makes a weak contribution.

## Purpose D at Marlow

4.5.1. The Marlow Conservation Area is highly significant, as indicated by the number of listed buildings – including 15 grade II\* listed and the grade I listed bridge – as well as its historical literary associations. However, the nearby Green Belt is all within the River Thames flood risk zone.

4.5.2. Attention focuses only on land to the southwest, and the large AA here is judged to make a strong contribution recognising that this is the highly significant River Thames corridor adjacent to the conservation area. Elsewhere around Marlow there are views of the town centre and the historic church from raised ground, perhaps most notably the raised land between Marlow and Marlow Bottom, but significance is limited.

## Purpose D at Princes Risborough

4.5.3. Princes Risborough has a small but highly valued historic core. There are important views towards and across the town from raised ground within the National Landscape to the southeast, but the historic core is buffered by significant modern built form. All AAs make a weak contribution.

## Purpose D at Wendover

4.5.4. Wendover has a popular historic core and there are important links to the surrounding countryside recognising that Wendover is located at the foot of the Chilterns escarpment. However, the historic core is not of the same significance as Marlow, for example as indicated by a total of four grade II\* listed buildings in comparison to 15 at Marlow. It is also important to note that the parish church (grade 2\*) is not located within the town centre.

4.5.5. Taking sectors around the conservation area in turn:

- Southeast – the AA directly east of the A413 comprises the southern extent of the conservation area including the grade 2\* listed church and so makes a strong contribution. The other AAs in this area make a moderate contribution, recognising that, whilst there is distinctly rising land accessed by important public rights of way, there is limited visual connectivity with either the town centre or the church.
- West – this is rising land to Baccombe Hill including as experienced from the Ridgeway National Trail. However, these AAs are separated from the conservation area by the A413 and HS2 is a major detracting feature. These AAs make a weak contribution.

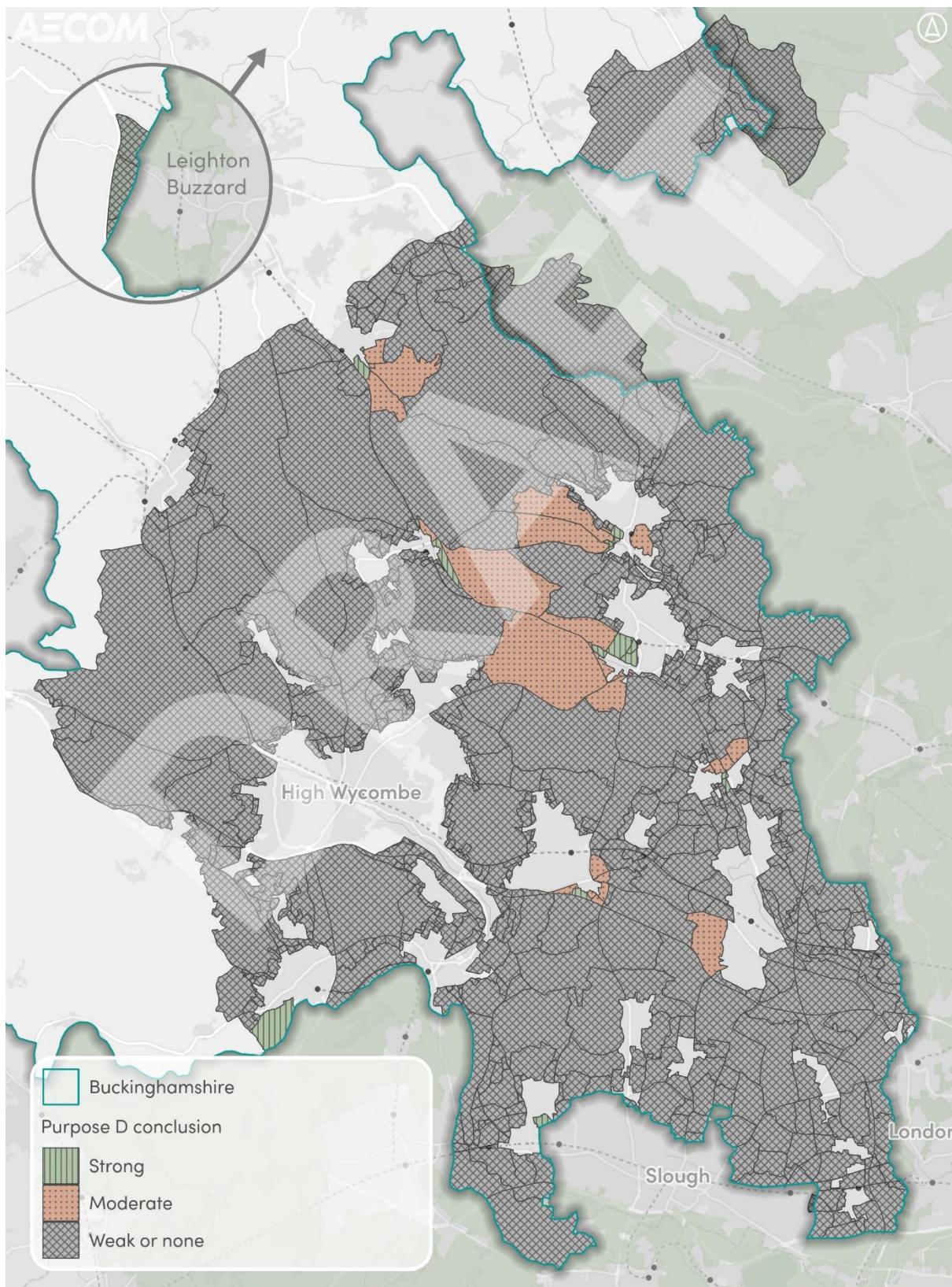
## Purpose D outcomes

4.5.6. In summary, the **outcome** is that 17 AAs are judged to make a strong contribution to Purpose A such that they are not grey belt, whilst the remaining 791 AAs do not make a strong contribution such that they 'can be grey belt' subject to Purpose A, Purpose B and further considerations below (specifically consideration of NPPF footnote 7 constraint).

**Table 4.3: Purpose D assessment findings**

Purpose D contribution	Implication for grey belt	Number of AAs
Strong	Not grey belt	17
Moderate	Can be grey belt	27
Weak or none	Can be grey belt	764

**Figure 4.3: Purpose D assessment findings**

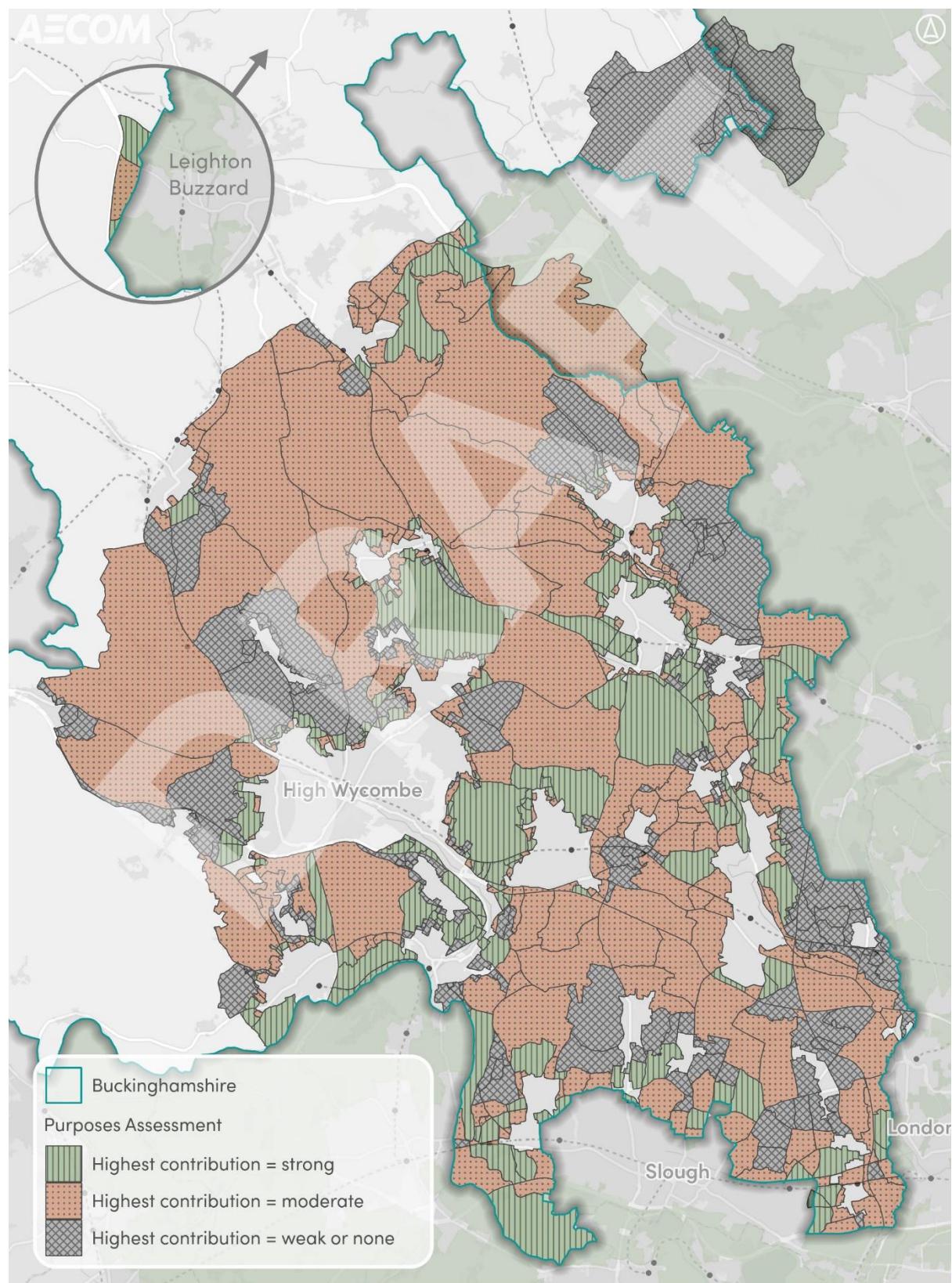


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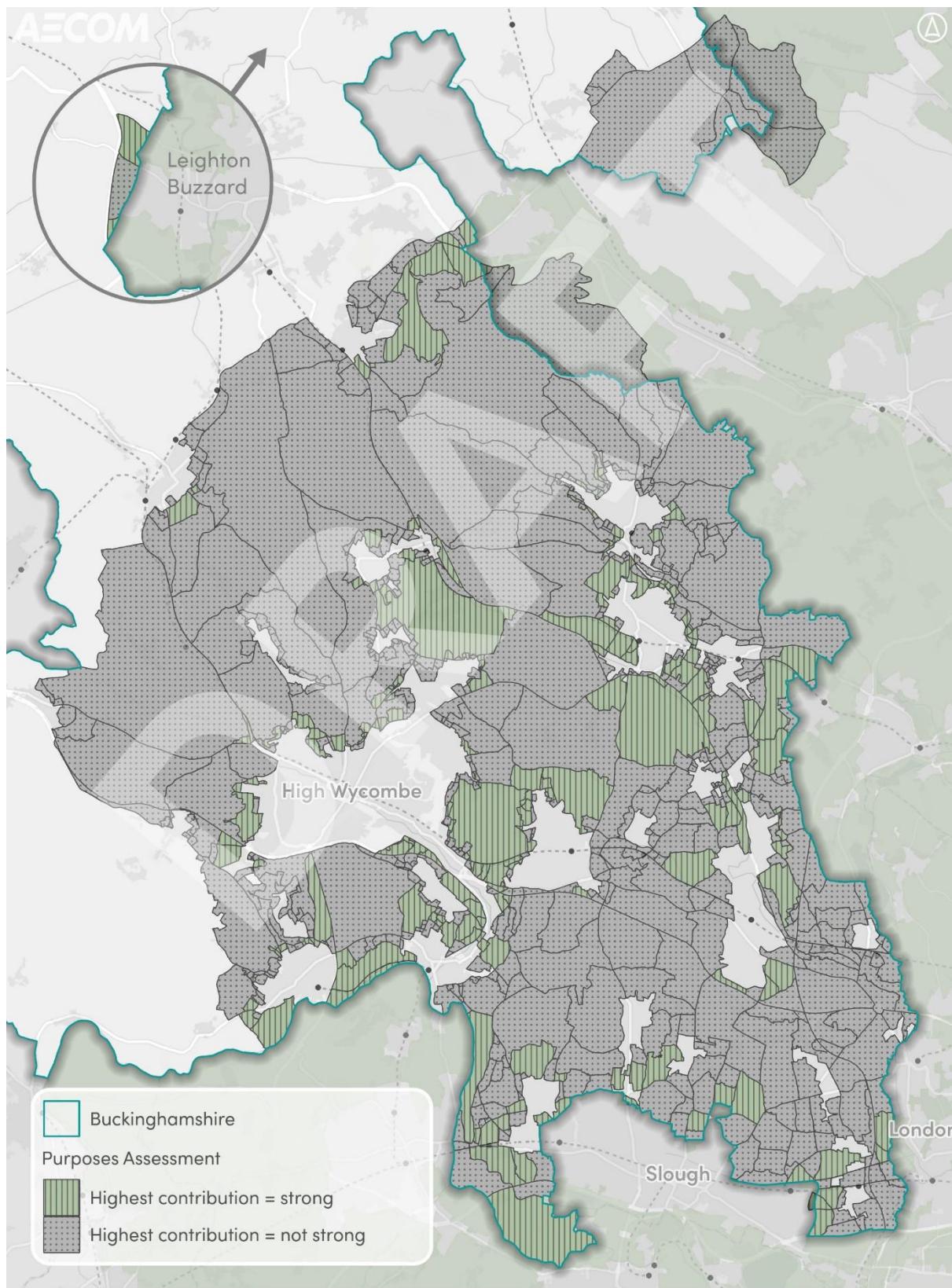
## 4.6. Conclusion on purposes

- 4.6.1. This section has provided an overview of the assessment of AAs in terms of the three relevant Green Belt purposes. In conclusion:
  - Purpose A – 149 AAs make a strong contribution (8% of the study area)
  - Purpose B – 55 AAs make a strong contribution (9% of the study area)
  - Purpose D – 17 AAs make a strong contribution (1% of the study area)
- 4.6.2. Overall, 205 out of 808 AAs make a strong contribution to one or more purposes such that they are not grey belt, which equates to 17% of the study area. Also, a further 313 AAs, whilst not making a strong contribution to any of the purposes, do make a moderate contribution to one or more of the purposes (58% of the study area).
- 4.6.3. Figure 4.4 shows the highest contribution to any of the three purposes made by each AA, whilst Figure 4.5 shows only those that score ‘strong’.
- 4.6.4. AA-specific assessment findings are presented in Section 6.

**Figure 4.4: Highest contribution to one of the three purposes**



**Figure 4.5: AAs that make a strong contribution to one or more purposes**



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# 5. NPPF footnote 7 assessment

## 5.1. Introduction

5.1.1. This section deals with step three of the PPG method, namely considering:

*“... whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area.”*

5.1.2. This is ‘NPPF footnote 7 assessment’ for short or, more fully, assessment of the extent to which AAs are affected by footnote 7 ‘constraint’.

5.1.3. Note this is **a standalone assessment stage**, undertaken in parallel to the purposes assessment reported in Section 4 (see Figure 1.2), i.e. it is undertaken regardless of the assessment in Section 4. Section 6 draws together these two assessment stages to reach overall conclusions.

## 5.2. Broad approach

5.2.1. In addition to the quote presented above, the PPG also states:<sup>19</sup>

*“... grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. In reaching this judgement, authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. Where this is the case, it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals.”*

5.2.2. From the above two quotes there are several key points to note.

- The focus is reaching a conclusion on “the assessment area” as a whole, i.e. such that the primary assumption is development in full.
- A key test is whether a constraint serves as “a strong reason for refusing or restricting development” or, alternatively, “potentially” serves as a strong reason for refusing or restricting development.
- There is a need to look beyond AAs “covered” by a designation to consider the possibility of development “affecting” a designation.
- One of three conclusions can be reached for any given AA following the assessment of footnote 7 constraint:
  - Excluded from being grey belt
  - Provisionally not excluded from being grey belt
  - Not excluded from being grey belt

<sup>19</sup> To reiterate, NPPF footnote 7 lists: “habitats sites (and those sites listed in paragraph ) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”

5.2.3. We elaborate on these points below.

## Terminology

5.2.4. There is a need for concise terminology in respect of the three conclusions that can be reached for any given AA in respect of any given footnote 7 constraint. Moving forward the following terminology is used:

- **Constrained** – such that the AA is excluded (i.e. it is not grey belt).
- **Provisionally constrained** – i.e. the AA is not excluded but can ultimately only be at most ‘provisional grey belt’ (subject to wider footnote 7 constraints and contribution to Green Belt purposes).<sup>20</sup>
- **Unconstrained** – such that the AA is not excluded and has the potential to ultimately be grey belt (subject to wider footnote 7 constraints and contribution to Green Belt purposes).

## A focus on AAs

5.2.5. The assumption must be that AAs would be developed in full. However, this is a clear limitation of this strategic study because, in practice, site options will come forward for consideration that comprise only part of an AA and, in turn, give rise to reduced concerns regarding footnote 7 constraint.

5.2.6. The implication is that all conclusions in respect of footnote 7 constraint reached through this GBA are *somewhat provisional*, and there is a clear recognition that further work looking at specific development site options may lead to conclusions that differ to those reached through this GBA.

5.2.7. Finally, note that whilst the assumption is that AAs are developed in full, the assumption is also that development would be in line with standard practice in respect of onsite green and blue infrastructure, including with an element of spatial targeting as necessary, e.g. development avoiding flood zones and buffering habitats (although, on the other hand, it is acknowledged that competing masterplanning priorities can create challenges). In other words, the assumption is *not* that built form would cover the entire AA.

5.2.8. In turn, **a key test** is whether the effect of one or more footnote 7 constraints would be to “restrict” development within an AA to a level below what would be anticipated in any case in line with standard practice.

5.2.9. Essentially, the view here is that where it is apparent that development of an AA would have to be significantly restricted in order to avoid footnote 7 constraints then it is reasonable to flag the AA as overall constrained, potentially to the point where it is not grey belt.

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<sup>20</sup> “Provisionally constrained” is considered to represent clearer terminology than “provisionally unconstrained”.

## Concluding on ‘potential effects’

- 5.2.10. Detailed assessment of impact pathways between AAs and footnote 7 constraints, and detailed consideration of the significance of potential impacts in light of agreed thresholds, is a matter for the plan-making and decision-making process subsequent to this GBA, drawing upon detailed evidence gathering, technical analysis and the input of specialists as appropriate. As part of this, account can be taken not only of specific sites but also scheme proposals, including in respect of use mix (we assume residential led development as this is the most common type of development proposal) and impact avoidance/mitigation measures.
- 5.2.11. Again, it is important to be clear that all footnote 7 assessment conclusions here are *somewhat provisional*, with clear potential for conclusions to be adjusted in light of follow-on detailed work.

## Firm versus ‘provisional’ conclusions

- 5.2.12. To reiterate, the PPG explains that where footnote 7 constraints apply “*it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals.*”
- 5.2.13. In light of the discussion above regarding the limitations of what can be achieved through a GBA, there is a case for concluding that most or perhaps even all AAs are ‘provisionally constrained’ in NPPF footnote 7 terms as part of this GBA, i.e. ahead of further detailed work.
- 5.2.14. Indeed, many recent GBAs simply conclude that all AAs are provisionally constrained, on the basis that it is not possible to reach a conclusion on whether AAs are constrained or unconstrained through a GBA.
- 5.2.15. However, to conclude provisionally constrained for all AAs would fail to align with the PPG, which expects GBAs to make “judgements” (this term appears numerous times within the PPG) and ultimately reach conclusions on grey belt (this is stated numerous times, with just one brief mention of “provisional” grey belt as a conclusion that “may” need to be reached).
- 5.2.16. In this light, we follow an approach that aims to strike a balance, with a high bar set in respect of the certainty needed to conclude ‘constrained’ or ‘unconstrained’, i.e. we acknowledge that where there is uncertainty it is appropriate to conclude ‘provisionally constrained’.

## 5.3. Methodology

- 5.3.1. NPPF footnote 7 assessment is methodologically challenging, and this is particularly the case within the study area, where footnote 7 constraints are **extensive and inter-related** at landscape scales (and good practice dictates a need to focus on inter-related constraints at landscape scales).
- 5.3.2. As such, the decision was taken to follow a staged approach to NPPF footnote 7 assessment. Specifically, this is an approach whereby footnote 7 constraints are considered in turn, and where a conclusion of ‘constrained’ (such that the AA is excluded as not grey belt) at one stage means that the AA need not proceed for assessment at subsequent stages.

## Details of the staged approach

5.3.3. The stages are discussed in turn below.

### Stage 1: National landscape (NL)

5.3.4. A blanket approach is taken whereby AAs entirely intersecting the NL are judged ‘constrained’ and those partially intersecting are ‘provisionally constrained’. Whilst site options within the NL may come forward for consideration alongside evidence demonstrating limited contribution to the purposes of NL, it is beyond the scope of this GBA to differentiate between AAs according to varying contribution to the NL purposes, such that a blanket approach must be taken. This leaves two possibilities, namely either: A) conclude that all AAs in the NL are ‘constrained’; or B) conclude that all AAs in the NL are ‘provisionally constrained’. On balance, approach (A) is favoured for reasons discussed further in **Appendix 3**.

5.3.5. Of the 808 input AAs, 379 are judged to be constrained and so excluded, whilst a further 9 are flagged as provisionally constrained.

### Stage 2: Local Green Space (LGS)

5.3.6. AAs comprising LGS are judged ‘constrained’ and those partially comprising LGS ‘provisionally constrained’. By way of context, LGS is land locally designated for its community importance; however, in practice, LGS within the Green Belt is very limited.<sup>21</sup> There are currently many areas of land that whilst undoubtedly of importance to the local community are not yet designated as LGS. **Appendix 4** presents further discussion.

5.3.7. Of the 429 input AAs, 3 are judged to be constrained and so excluded, whilst a further 1 is flagged as provisionally constrained.

### Stage 3: Flood risk

5.3.8. AAs significantly intersecting flood risk zones (fluvial and surface water) are judged ‘constrained’ and a number of others intersecting flood risk zones but less significantly are ‘provisionally constrained’. **Appendix 5** presents further discussion of the methodological approach with reference to percentage intersect with flood zones and wider factors.

5.3.9. Of the 426 input AAs, 27 are judged to be constrained and so excluded, whilst a further 12 are flagged as provisionally constrained.

### Stage 4: Biodiversity

5.3.10. This assessment is more challenging because there is a need to account not only for intersect and proximity to designated sites (internationally designated ‘habitats site’ and nationally designated SSSIs) but also wider potential impact pathways. As such, there are no simple decision-making criteria, and professional judgement must be applied. **Appendix 6** presents further discussion of the methodological approach.

<sup>21</sup> This is because the aim of LGS designation is to afford the same protection as Green Belt.

5.3.11. Of the 399 input AAs, 30 are judged to be constrained and so excluded, whilst a further 253 are flagged as provisionally constrained.<sup>22</sup>

### Stage 5: Irreplaceable habitat

5.3.12. Whilst intersect and proximity to irreplaceable habitat is the primary factor, it is nonetheless difficult to define decision-making criteria, because ancient woodland is extensive in the study area and there is a need to account for the configuration of ancient woodland within and around AAs. **Appendix 7** presents further discussion of the methodological approach.

5.3.13. Of the 369 input AAs, 31 are judged to be constrained and so excluded, whilst a further 66 are flagged as provisionally constrained.

### Stage 6: Historic environment

5.3.14. Again, whilst distance/intersect (GIS) analysis has an important role, it cannot always provide the answer. Qualitative assessment and professional judgement must be employed to account for impact pathways including relating to the 'setting' of assets and in combination ('group value') factors. **Appendix 8** presents further discussion.

5.3.15. Of the 338 input AAs, 31 are judged to be constrained and so excluded, whilst a further 109 are flagged as provisionally constrained.

### Stage 7: NL setting

5.3.16. Government [guidance](#) is clear on the importance of factoring in the setting of NLs. However, doing so is methodologically challenging because there is a heavy reliance on professional judgement. **Appendix 9** presents further discussion of the methodological approach taken.

5.3.17. Of the 307 input AAs, none are judged to be constrained (such that none are excluded) but 89 are flagged as provisionally constrained.<sup>23</sup>

## GIS analysis

5.3.18. Whilst NPPF footnote 7 assessment inevitably involves the application of professional judgement, the judgements made as part of this GBA have been informed by GIS analysis of the spatial relationship (distance and percentage intersect) between AAs and NPPF footnote 7 constraints.

5.3.19. GIS analysis can rarely provide the answer (without the application of major assumptions that then risk being called into question) but is always a key input. GIS analysis is discussed across Appendices 3 to 9.

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<sup>22</sup> The high proportion of AAs are assessed as 'provisionally constrained' reflects the fact that reaching firm conclusions is methodologically challenging. As part of this, it should be noted that a conclusion of 'provisionally constrained' is reached for all AAs that fall within one of the two defined recreational impact zones of influence for Special Areas of Conservation (SACs) that affect the plan area, namely a 12.6km zone surrounding the Ashridge component of the Chilterns Beechwoods SAC and the 5.7km zone surrounding Burnham Beeches SAC.

<sup>23</sup> One of two conclusions was reached for each of the 307 AAs: 1) Not within the NL setting and so unconstrained; 2) Within the NL setting and so provisionally constrained. See further discussion in Appendix 9.

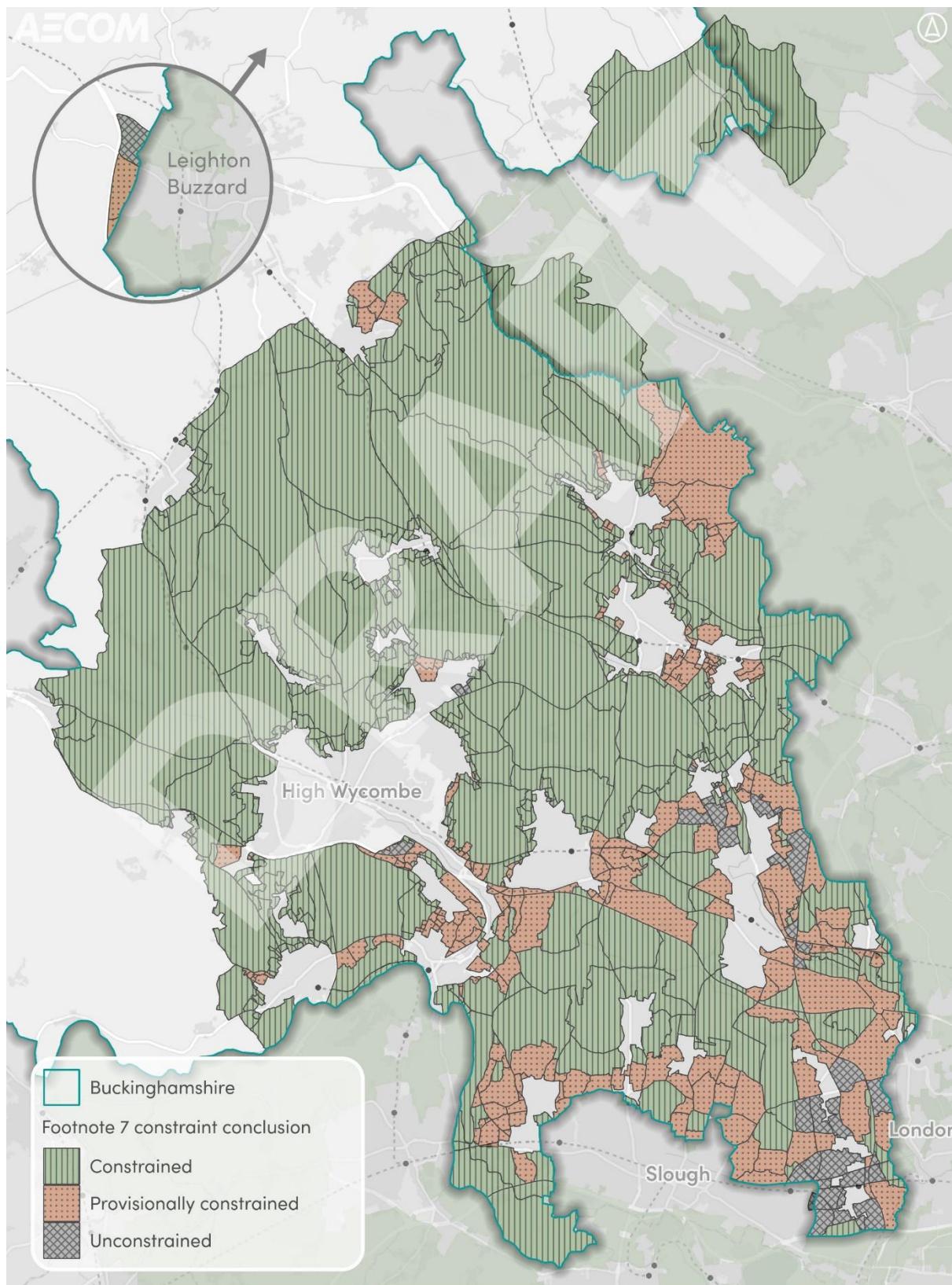
## 5.4. Conclusion on NPPF footnote 7

- 5.4.1. For each assessment stage the respective appendix presents an overview of assessment findings, including a map categorising AAs as follows:
  - Already ruled out (N.B. not applicable to Stage 1)
  - Constrained
  - Provisionally constrained
  - Unconstrained
- 5.4.2. Overall, the assessment finds that **83%** of the study area is constrained in NPPF footnote 7 terms such that it is not grey belt.
- 5.4.3. The primary factor is the National Landscape (NL), with 66% of the study area ‘constrained’ on this basis. As discussed above (and in more detail in Appendix III), it is considered reasonable to judge AAs within the NL as ‘constrained’, essentially because it is evident (including on the basis of the analysis presented in Appendix III) that the great majority of land within the NL is indeed constrained from a NL perspective, and it is beyond the scope of this study to identify land in the NL that is not constrained. However, moving forward specific site options, scheme proposals and wider evidence could emerge that leads to the identification of grey belt in the NL.
- 5.4.4. Outside of the NL **48%** of the area is constrained and, in this regard, it is important to note that within the south of Buckinghamshire (the primary sector of the study area outside of the NL) there is: a very high density of ancient woodland (of at least sub-regional significance); a high density of designated biodiversity sites including Burnham Beeches SAC; major flood risk zones including the Rivers Thames and Colne; and a high density of heritage assets including 14 Registered Parks and Gardens.<sup>24</sup>
- 5.4.5. Also, a further **15%** of the study area is judged provisionally constrained under one or more of the footnote 7 headings and so can only be provisional grey belt (where a final decision on ‘provisional grey belt’ versus ‘not grey belt’ must also factor in the Green Belt purposes assessment).<sup>25</sup>
- 5.4.6. Figure 5.1 shows an overview of the NPPF footnote 7 assessment. Appendices 3 to 9 present further information.
- 5.4.7. AA-specific assessment findings are presented in Section 6.

<sup>24</sup> There are also numerous locally listed parks/gardens in this area (see <https://local-heritage-list.org.uk/buckinghamshire/map>), reflecting links to London, and several include work by Lancelot “Capability” Brown (e.g. discussed [here](#)).

<sup>25</sup> It can be noted that whilst most are subject to just one footnote 7 constraint (e.g. flood risk) a total of 39 are subject to two constraints (e.g. flood risk and biodiversity), 13 are subject to three and one is subject to four.

**Figure 5.1: Overview of the NPPF footnote 7 assessment**



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# 6. Conclusions on grey belt

## 6.1. Introduction

6.1.1. The section draws together the analysis in Sections 4 and 5 to identify grey belt as well as provisional grey belt. This section:

- Presents the key findings.
- Presents a table of summary findings for each AA.

## 6.2. Key findings

6.2.1. In light of the analysis set out in Sections 4 and 5:<sup>26</sup>

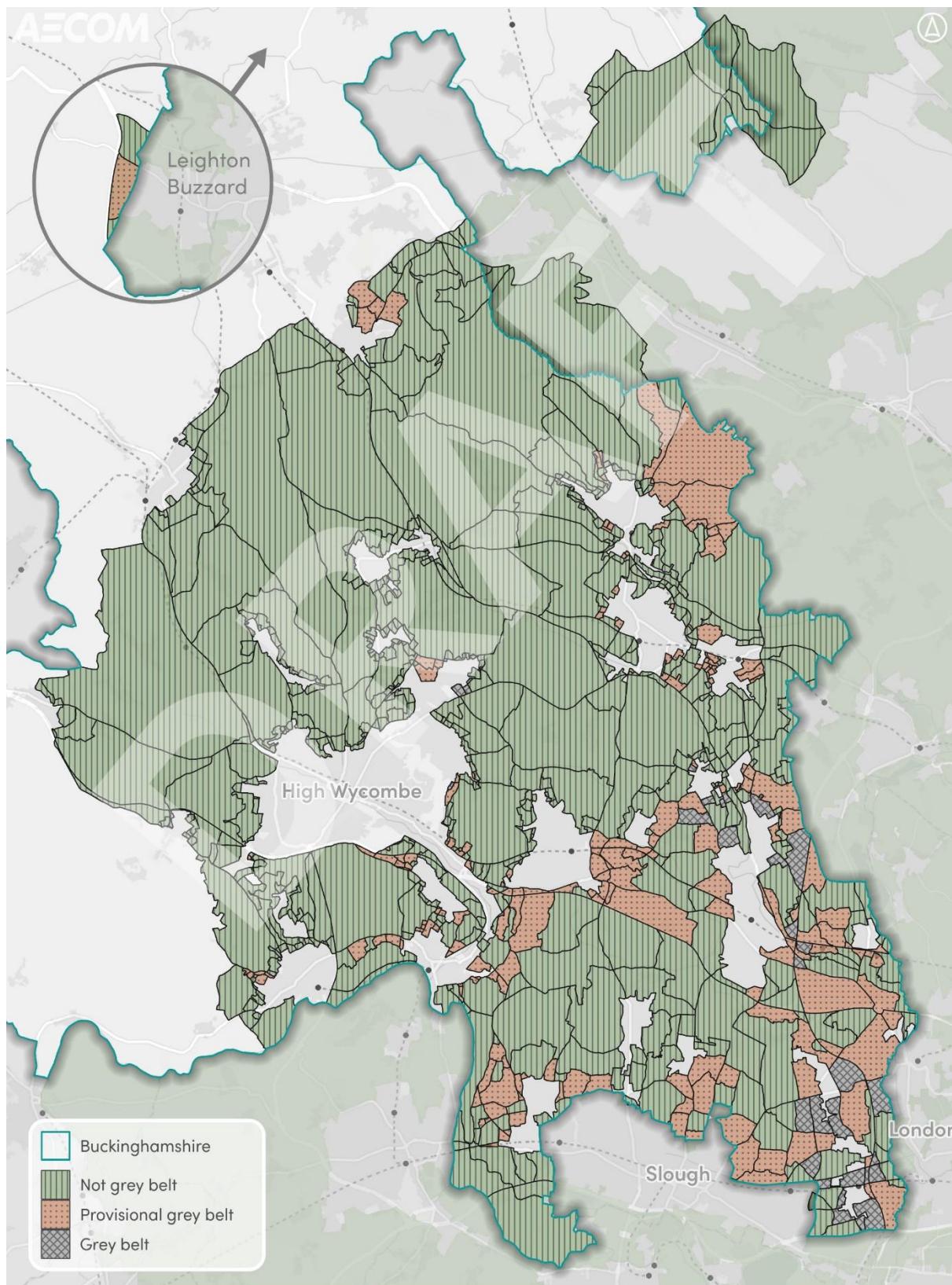
- 567 AAs are **not grey belt** due to contributing strongly to one or more of the relevant Green Belt purposes and/or being constrained in terms of NPPF footnote 7. This equates to 86.4% of the study area.
- 208 AAs are **provisional grey belt** due to not contributing strongly to any of the Green Belt purposes but being provisionally constrained in terms of footnote 7. This equates to 11.9% of the study area.
- 33 AAs are **grey belt** due to not contributing strongly to any of the Green Belt purposes and being unconstrained in terms of footnote 7. This equates to 1.8% of the study area.

6.2.2. Final points to note are as follows:

- 13.7% of the study area is grey belt or provisional grey belt and this figure rises to 40.6% outside of the NL (of which 5.3% is grey belt).
- If footnote 7 constraints were to be disapplied then 83% of the study area would be grey belt (with no provisional grey belt), including 85% of land within the NL. This finding is not out of line with GBAs elsewhere that have not considered footnote 7 constraint and so concluded that any AA not making a strong contribution to purposes is provisional grey belt; for example: 1) the Sevenoaks GBA (2025) where 92% of AAs are provisional grey belt; 2) the Tonbridge and Malling GBA (2025) where 99% of AAs are provisional grey belt; and 3) the Rugby GBA (2026) where a Stage 1 study finds the majority of the Borough to be provisional grey belt due to being distant from a large built up area or a town.
- As a caveat, it is important to reiterate that this is a strategic study in the sense that: A) its focus is on AAs not site options; and B) the NPPF footnote 7 assessment is unavoidably somewhat limited in its scope. Also, a conclusion of grey belt does not mean that an AA will be released from the Green Belt for development and vice versa a conclusion of not grey belt does not mean that an AA cannot be considered for release from the Green Belt for development. Work to identify grey belt, as set out in this GBA, is a step in the wider plan-making and planning process.

<sup>26</sup> 96% of the study area is within Buckinghamshire and this includes all identified grey belt and provisional grey belt.

**Figure 6.1: Grey belt and provisional grey belt identified through this GBA**



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**Table 6.1: Summary of the process for assessing all 808 AAs**

Assessment	Notes	Number of AAs
<b>Green Belt Purpose A</b>		<b>808</b>
Strong	Not grey belt	149
Moderate	Can be grey belt	214
Weak or none	Can be grey belt	445
<b>Green Belt Purpose B</b>		<b>808</b>
Strong	Not grey belt	55
Moderate	Can be grey belt	178
Weak or none	Can be grey belt	575
<b>Green Belt Purpose D</b>		<b>808</b>
Strong	Not grey belt	17
Moderate	Can be grey belt	27
Weak or none	Can be grey belt	764
<b>Footnote 7 stage 1: National Landscape (NL)</b>		<b>808</b>
Constrained	Not grey belt	379
Provisionally constrained	Can be provisional grey belt	9
Unconstrained	Can be grey belt	420
<b>Footnote 7 stage 2: Local Green Space (LGS)</b>		<b>429</b>
Constrained	Not grey belt	3
Provisionally constrained	Can be provisional grey belt	1
Unconstrained	Can be grey belt	425
<b>Footnote 7 stage 3: Flood risk</b>		<b>426</b>
Constrained	Not grey belt	27
Provisionally constrained	Can be provisional grey belt	12
Unconstrained	Can be grey belt	387

Assessment	Notes	Number of AAs
<b>Footnote 7 stage 4: Biodiversity</b>		<b>399</b>
Constrained	Not grey belt	30
Provisionally constrained	Can be provisional grey belt	253
Unconstrained	Can be grey belt	116
<b>Footnote 7 stage 5: Irreplaceable habitat</b>		<b>369</b>
Constrained	Not grey belt	31
Provisionally constrained	Can be provisional grey belt	66
Unconstrained	Can be grey belt	272
<b>Footnote 7 stage 6: Historic environment</b>		<b>338</b>
Constrained	Not grey belt	31
Provisionally constrained	Can be provisional grey belt	109
Unconstrained	Can be grey belt	198
<b>Footnote 7 stage 7: NL setting</b>		<b>307</b>
Constrained	Not grey belt	N/a
Provisionally constrained	Can be provisional grey belt	89
Unconstrained	Can be grey belt	218
<b>Overall conclusion (combining the two assessments)</b>		<b>808</b>
Not grey belt	Makes a strong contribution to one or more of the Green Belt purposes and/or 'constrained' in terms of NPPF footnote 7.	567
Provisional grey belt	Does not make a strong contribution to any of the Green Belt purposes but 'provisionally constrained'.	208
Grey belt	Does not make a strong contribution to any of the Green Belt purposes and 'unconstrained'.	33

## 6.3. Summary findings for each AA

6.3.1. Table 6.1 shows summary findings for all 808 AAs. Points to note:

- The first three columns deal with the Green Belt Purpose A, Purpose B and Purpose D. Within these columns AAs are assigned:
  - ‘S’ and **green** shading where performance is strong.
  - ‘M’ and **red** shading where performance is moderate
  - ‘W’ and **red** shading where performance is ‘weak or none’.
- The next seven columns deal with the NPPF footnote 7 assessment, namely assessment in respect of: National Landscape (NL), Local Green Space (LGS), flood risk (FR), biodiversity (BD), irreplaceable habitat (IR), historic environment (HE) and National Landscape setting (NLS).
- Within these columns AAs are assigned:
  - ‘C’ and **green** shading where the conclusion is ‘constrained’
  - ‘P’ and **amber** shading where the conclusion is ‘provisionally constrained’.
  - ‘U’ and **red** shading where the conclusion is ‘unconstrained’.
  - No text and **blue** shading where the AA has already been ruled out at a previous stage of the assessment.
- An asterisk (\*) alongside a conclusion of ‘constrained’ or ‘unconstrained’ indicates a ‘marginal’ conclusion (see further discussion in appendices).

6.3.2. Final points to note regarding Table 6.1 are as follows:

- An AA is **not grey belt** where there is one or more greens.
- An AA is **provisional grey belt** where there are reds in all three of the purposes columns but one or more ambers in the footnote 7 columns.
- An AA is **grey belt** where there are reds across all columns.
- Where there is a ‘green’ under one of the footnote 7 headings (NL, LGS, FR, BD, IR, HE, NLS) then subsequent columns are blue, which is a reflection of the ‘staged’ approach to NPPF footnote 7 assessment.

6.3.3. **Appendix 10** presents an assessment proforma for each AA and assessment findings can also be interrogated via an interactive web map.

**Table 6.1: Summary findings of the GBA**

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
AC001	W	M	W	C							Not grey belt
AM001-a	M	S	W	U	U	U	P	P	P	P	Not grey belt
AM001-b	S	M	W	U	U	U	P	U	U	P	Not grey belt
AM002	S	M	W	C							Not grey belt
AM003	S	W	W	U	U	U	P	C			Not grey belt
AM004	M	W	W	U	U	U	P	P	U	P	Provisional grey belt
AM005	M	W	W	C							Not grey belt
AM006	S	W	W	C							Not grey belt
AM007	S	M	W	U	U	U	P	U	U	P	Not grey belt
AM008-a	S	S	W	U	U	U	P	U	C		Not grey belt
AM008-b	M	S	W	U	U	U	P	U	U	U	Not grey belt
AM009	M	S	W	U	U	U	P	U	U	U	Not grey belt
AM010	M	S	W	U	U	U	P	U	P	U	Not grey belt
AM011	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
AM012	W	W	W	U	U	U	P	U*	U	U	Provisional grey belt
AM013	S	W	W	U	U	U	P	C			Not grey belt
AM014	S	M	W	U	U	U	P	P	U	U	Not grey belt
AM015	M	W	W	U	U	U	U	P	U	U	Provisional grey belt
AM016	S	W	W	C							Not grey belt
AM017-a	M	W	W	C							Not grey belt
AM017-b	M	W	M	U	U	U	U	U	P	P	Provisional grey belt
AM019	S	M	M	C							Not grey belt
AM020	M	W	M	C							Not grey belt
AM021	M	W	S	C							Not grey belt
AM022	S	W	S	C							Not grey belt
AM023	S	W	S	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
AM024-a	M	W	S	C							Not grey belt
AM024-b	S	M	M	C							Not grey belt
AM025	M	W	W	U	U	U	P	P	U	U	Provisional grey belt
AM026	S	W	W	U	U	U	P	C			Not grey belt
AM027	M	W	W	U	U	U	P	P	U	P	Provisional grey belt
AM028	M	W	W	U	U	U	P	U	U	P	Provisional grey belt
AM029	S	W	W	C							Not grey belt
AM030-a	S	S	W	C							Not grey belt
AM030-b	M	W	W	P	U	U	P	U	P	P	Provisional grey belt
AM030-c	M	W	W	U	U	U	P	P	U	P	Provisional grey belt
AM031-a	S	S	W	C							Not grey belt
AM031-b	S	S	W	U	U	U	P	C			Not grey belt
BF001	S	M	W	C							Not grey belt
BF003	M	W	W	C							Not grey belt
BF004	M	W	W	U	U	U	P	U	P	P	Provisional grey belt
BF005	M	W	W	U	U	U	P	U	U	U	Provisional grey belt
BF006	M	W	M	U	U	U	P	U	P	U	Provisional grey belt
BF007	M	W	M	U	U	U	P	U	P	U	Provisional grey belt
BF008	M	W	M	U	U	U	P	U	U*	U	Provisional grey belt
BF009	M	W	M	U	U	U	P	U	U*	U	Provisional grey belt
BF010	M	W	M	U	U	U	P	U	P	U	Provisional grey belt
BF011	M	W	S	U	U	U	P	U	C*		Not grey belt
BF012	M	W	M	U	U	U	P	U	P	U	Provisional grey belt
BF013	M	W	W	U	U	U	P	U	U	U	Provisional grey belt
BF014	M	M	W	U	U	U	P	U	U	U	Provisional grey belt
BF015	M	M	W	U	U	U	P	U	U	U	Provisional grey belt
BF016	M	S	W	U	U	U	P	P	U	U	Not grey belt
BF017	M	M	W	U	U	U	P	P	U	U	Provisional grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
BF018	S	S	W	U	U	U	P	C*			Not grey belt
BF019	M	W	W	U	U	U	P	U	U	P	Provisional grey belt
BF020	S	W	W	U	U	U	P	U	U*	P	Not grey belt
BF021	S	M	W	C							Not grey belt
BF022	M	W	W	U	U	U	P	U	C		Not grey belt
BF023	M	W	W	C							Not grey belt
BF024	S	W	W	C							Not grey belt
BF025-a	M	W	W	C							Not grey belt
BF025-b	M	W	W	C							Not grey belt
BF026	S	W	W	C							Not grey belt
BF027	S	W	W	C							Not grey belt
BF028	M	W	W	C							Not grey belt
BF029	S	W	W	C							Not grey belt
BF030	M	W	W	C							Not grey belt
BF031	S	M	W	C							Not grey belt
BF032	S	M	W	C							Not grey belt
BF033	S	W	W	C							Not grey belt
BF034-a	M	W	W	U	U	U	U	U	U*	U	Grey belt
BF034-b	S	W	W	C							Not grey belt
BF035	M	W	W	C							Not grey belt
BW002	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
BW003	W	M	W	U	U	U	P	U	P	U	Provisional grey belt
BW004	S	S	W	U	U	U	P	U	P	U	Not grey belt
BW005	M	S	W	U	U	U	P	U	C		Not grey belt
BW006	M	S	W	U	U	P	P	U	P	U	Not grey belt
BW007	S	S	W	U	U	U	P	P	C		Not grey belt
BW008	W	W	W	U	U	U	P	P	P	U	Provisional grey belt
BW009	W	W	W	U	U	U	P	P	U	U	Provisional grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
BW010	W	M	W	U	U	U	P	C			Not grey belt
BW011	W	W	W	U	U	U	P	U*	U	U	Provisional grey belt
BW012	W	W	W	U	U	U	P	P	P	U	Provisional grey belt
BW013	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
BW014	W	W	W	U	U	U	P	U	C		Not grey belt
BW015	W	W	W	U	U	C					Not grey belt
BW019	W	W	W	U	U	C					Not grey belt
BW020	W	W	W	U	U	P	U	U	P	P	Provisional grey belt
BW021	W	M	W	U	U	U	U	U	U*	P	Provisional grey belt
BW022	W	W	W	C							Not grey belt
BW023	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
BW024	W	M	W	U	U	U	P	U	U	P	Provisional grey belt
BW025	W	M	W	U	U	U	P	U	U	U	Provisional grey belt
BW026	W	S	W	U	U	U	P	U	U*	U	Not grey belt
BW027	W	W	W	U	U	U	P	U	C		Not grey belt
CG001	W	W	M	C							Not grey belt
CG002	W	M	M	C							Not grey belt
CG003	W	M	W	C							Not grey belt
CG004	W	S	W	C							Not grey belt
CG005	W	W	W	C							Not grey belt
CG006	W	M	W	U	U	U	U	U	U	P	Provisional grey belt
CG007	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
CG008	W	M	W	U	U	U	U	U	P	U	Provisional grey belt
CG009	W	M	W	U	U	U	U	P	U	U	Provisional grey belt
CG010	W	M	W	U	U	U	U	C			Not grey belt
CG011	W	W	S	U	C						Not grey belt
CG012	W	M	S	U	P	C					Not grey belt
CG013	W	W	W	U	U	U	U	U	U	U	Grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
CG014	W	W	M	U	U	U	U	U	C		Not grey belt
CG015	W	W	S	U	C						Not grey belt
CG016	W	W	W	U	U	U	U	U	P	U	Provisional grey belt
CG017	W	M	W	U	U	U	U	U	U	U	Grey belt
CG018	W	W	W	U	C						Not grey belt
CG019	W	M	W	U	U	U	U	U	U	U	Grey belt
CG020	W	M	W	U	U	U	P	U	P	U	Provisional grey belt
CG021	W	M	W	U	U	U	C				Not grey belt
CG022	W	W	W	U	U	U	C				Not grey belt
CG023	W	W	W	U	U	U	U	U	U	U	Grey belt
CG024	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
CG025	W	W	W	C							Not grey belt
CG026	W	W	W	C							Not grey belt
CG027	W	W	W	C							Not grey belt
CG028	W	W	M	C							Not grey belt
CG029	W	W	M	C							Not grey belt
CH001	M	W	W	C							Not grey belt
CH002	M	W	W	C							Not grey belt
CH003	M	W	W	C							Not grey belt
CH004	M	W	W	U	U	U	P	U	U*	P	Provisional grey belt
CH005	S	W	W	U	U	U	P	U	U	U	Not grey belt
CH006	S	W	W	U	U	U	P	U	P	P	Not grey belt
CH007	M	W	W	U	U	U	P	U	P	P	Provisional grey belt
CH008	S	W	W	C							Not grey belt
CH009	M	W	M	C							Not grey belt
CH010-a	M	W	W	C							Not grey belt
CH010-b	M	W	W	U	U	U	P	U	U	U	Provisional grey belt
CH011	M	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
CH012	M	W	W	C							Not grey belt
CH013	M	M	W	U	U	C					Not grey belt
CH014	M	S	W	U	U	U	P	U	U	U	Not grey belt
CH015	M	W	W	U	U	C					Not grey belt
CH016	M	M	W	C							Not grey belt
CH017	M	S	W	C							Not grey belt
CH018	W	W	W	U	U	U*	P	U	U	U	Provisional grey belt
CH019	W	W	W	U	U	U*	P	U	U	U	Provisional grey belt
CH020	M	M	W	C							Not grey belt
CH021	M	W	W	C							Not grey belt
CH022	S	W	W	C							Not grey belt
CH023-a	M	W	S	C							Not grey belt
CH023-b	M	W	S	P	U	U	P	U	C		Not grey belt
CH024	M	W	S	U	U	U	P	U	C		Not grey belt
CH025	M	W	S	U	U	U	P	U	C		Not grey belt
CH026	M	W	W	U	U	U	P	U	U*	U	Provisional grey belt
CH027	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
CH028	M	W	W	C							Not grey belt
CH029	S	W	W	U	U	U	P	P	U	P	Not grey belt
CH030	M	W	W	C							Not grey belt
CH031	S	W	W	C							Not grey belt
CH032	M	W	W	C							Not grey belt
CH033-a	M	W	W	C							Not grey belt
CH033-b	M	W	W	U	U	U	P	U	U	P	Provisional grey belt
CH034	M	W	W	C							Not grey belt
CH035	S	W	W	C							Not grey belt
CH036	M	W	W	C							Not grey belt
CH037	W	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
CH038	M	W	W	C							Not grey belt
CH039	S	W	W	C							Not grey belt
CH040	S	W	W	C							Not grey belt
CH041	M	W	W	C							Not grey belt
CH042	M	W	W	C							Not grey belt
CH043	S	W	W	C							Not grey belt
CH044	M	W	W	U	U	U	P	P	U	U	Provisional grey belt
CH045	S	W	W	U	U	U	P	P	P	P	Not grey belt
CH046	M	W	W	C							Not grey belt
CH047	S	W	W	C							Not grey belt
CH048	M	W	W	C							Not grey belt
CH049	M	W	W	C							Not grey belt
CPGC001	S	S	W	U	U	U	P	U	U		Not grey belt
CPGC002	W	M	W	U	U	U	U	U	U*	U	Grey belt
CPGC003	S	W	W	U	U	U	U	U	U	U	Not grey belt
CPGC004	M	W	W	U	U	U*	U	P	U	U	Provisional grey belt
CPGC005	M	W	W	U	U	U	P	U	U		Provisional grey belt
CPGC006	S	W	W	U	U	U	C				Not grey belt
CPGC007	S	W	W	U	U	U	P	U	U		Not grey belt
CPGC008	M	W	W	U	U	U	U	U	U	U	Grey belt
CPGC009	S	W	W	U	U	U	P	P	U		Not grey belt
CPGC010	M	W	W	U	U	U	U	P	U		Provisional grey belt
CPGC011	M	W	W	U	U	P	U	U	P	U	Provisional grey belt
CPGC012	M	W	W	U	U	P	U	U	U	U	Provisional grey belt
CPGC013	M	W	W	U	U	U	P	U	P	U	Provisional grey belt
CPGC014	S	W	W	U	U	U	P	U	P	U	Not grey belt
CPGC015	S	W	W	U	U	U	P	U	U	U	Not grey belt
CPGC016	M	W	W	U	U	U	P	U*	U	U	Provisional grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
CPGC017	S	W	W	U	U	U	P	C			Not grey belt
CPGC018	M	M	M	U	U	U	P	P	C*		Not grey belt
CPGC019	M	M	W	U	U	U	P	U*	P	U	Provisional grey belt
CPGC020	M	W	W	U	U	U	P	U*	U	U	Provisional grey belt
CPGC021	S	M	W	U	U	U	P	C*			Not grey belt
CPGC022	M	M	W	U	U	U	P	P	U	U	Provisional grey belt
CPGC023	M	M	W	U	U	U	U	U	U	U	Grey belt
CPGC024	M	S	W	U	U	C*					Not grey belt
CW001	W	W	W	C							Not grey belt
CW002	W	M	W	C							Not grey belt
CW003	W	M	W	C							Not grey belt
DG001	W	W	W	U	U	C					Not grey belt
DG002	W	W	W	U	U	U*	C				Not grey belt
DG003	W	W	W	U	U	C					Not grey belt
DG004	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
DG005	W	W	W	U	U	U	P	U	U*	U	Provisional grey belt
DG006	W	W	W	U	U	U	C				Not grey belt
DG007	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
DG008	W	W	W	U	U	U	C				Not grey belt
EW001	W	S	W	U	U	C					Not grey belt
FC001	W	M	W	U	U	U	C				Not grey belt
FC002-a	W	W	W	U	U	U	P	C			Not grey belt
FC002-b	W	W	W	U	U	U	C				Not grey belt
FC002-c	M	S	W	U	U	U	P	U	P	U	Not grey belt
FC003	W	W	W	U	U	U	C				Not grey belt
FC004	W	W	W	U	U	U	C				Not grey belt
FH001	W	M	W	U	U	U	U	C			Not grey belt
FH002	M	S	W	U	U	U	P	P	P	U	Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
FH003	S	S	W	U	U	U	P	U	U*	U	Not grey belt
FH004	W	M	W	U	U	U	P	U	U*	U	Provisional grey belt
FH005	W	S	W	U	U	U	P	U	U	U	Not grey belt
FH006	W	M	W	U	U	U	P	U	U	U	Provisional grey belt
FH007	W	M	W	U	U	U	P	U	U	P	Provisional grey belt
FH008	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
FH009	W	W	W	C							Not grey belt
FH010	W	W	W	C							Not grey belt
FH011	W	W	W	C							Not grey belt
FH012	W	W	W	C							Not grey belt
FH013-a	W	W	W	C							Not grey belt
FH013-b	W	W	W	P	U	U	U	U	U	P	Provisional grey belt
FH014	W	W	W	U	U	U	U	P	U	P	Provisional grey belt
FH015	W	W	W	U	U	U	U	C			Not grey belt
FH016	W	M	W	U	U	U	U	P	U	U	Provisional grey belt
GK001	W	W	W	C							Not grey belt
GK002	W	W	W	C							Not grey belt
GK003	W	W	W	C							Not grey belt
GK004	W	W	W	C							Not grey belt
GK005	W	W	W	C							Not grey belt
GK006	W	W	W	C							Not grey belt
GK007	W	W	W	C							Not grey belt
GK008	W	W	W	C							Not grey belt
GK009	W	W	W	C							Not grey belt
GK010	W	W	W	C							Not grey belt
GK011	W	W	W	C							Not grey belt
GK012	W	W	W	C							Not grey belt
GK013	W	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
GK014	W	W	W	C							Not grey belt
GK015	W	W	W	C							Not grey belt
GK016	W	W	W	C							Not grey belt
GK017	W	W	W	C							Not grey belt
GK018	W	W	W	C							Not grey belt
GK019	W	W	W	C							Not grey belt
GK020	W	W	W	C							Not grey belt
GK021	W	W	W	C							Not grey belt
HW001	S	W	W	C							Not grey belt
HW002	M	W	W	C							Not grey belt
HW003	S	W	W	C							Not grey belt
HW004	S	W	W	C							Not grey belt
HW005	S	W	W	C							Not grey belt
HW006	S	W	W	C							Not grey belt
HW007	S	W	W	C							Not grey belt
HW008	S	W	W	C							Not grey belt
HW009	M	W	W	C							Not grey belt
HW010	M	W	W	C							Not grey belt
HW011	S	W	W	C							Not grey belt
HW012	S	W	W	C							Not grey belt
HW013	S	W	W	C							Not grey belt
HW014	M	W	W	C							Not grey belt
HW015	M	W	W	C							Not grey belt
HW016	S	W	W	C							Not grey belt
HW017	M	W	W	C							Not grey belt
HW018	S	W	W	C							Not grey belt
HW019	S	W	W	U	U	U	U	U	P	P	Not grey belt
HW020	M	W	W	U	U	U	U	U	U*	P	Provisional grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
HW021	M	W	W	U	U	U	U	U	U	P	Provisional grey belt
HW022	M	W	W	C							Not grey belt
HW023	S	W	W	C							Not grey belt
HW024	M	W	W	C							Not grey belt
HW025	S	W	W	C							Not grey belt
HW026	M	W	W	C							Not grey belt
HW027	S	W	W	C							Not grey belt
HW028	S	W	W	C							Not grey belt
HW029	M	W	W	C							Not grey belt
HW030	W	W	W	P	U	U	U	U	U	U	Provisional grey belt
HW031	M	W	W	C							Not grey belt
HW032	S	W	W	C							Not grey belt
HW033	M	W	W	U	U	U	U	U	U	U	Grey belt
HW034	M	W	W	U	U	U	U	U	U	U	Grey belt
HW035	W	W	W	U	U	U	U	U	U	U	Grey belt
HW039	M	W	W	C							Not grey belt
HW041	M	W	W	C							Not grey belt
HW042	S	W	W	C							Not grey belt
HW043	M	W	W	C							Not grey belt
HW044	M	W	W	C							Not grey belt
HW045	S	W	W	C							Not grey belt
HW046	M	W	W	C							Not grey belt
HW047	M	W	W	C							Not grey belt
HW048	M	W	W	U	U	U	U	U	P	P	Provisional grey belt
HW049	S	W	W	C							Not grey belt
HW050	W	W	W	C							Not grey belt
HW051	W	W	W	C							Not grey belt
HW052	W	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
HW053	M	W	W	C							Not grey belt
HW054	W	W	W	U	U	U	U	U	P	U	Provisional grey belt
HW055	W	W	W	U	U	U	U	U	U	U	Grey belt
HW056	M	W	W	U	U	U	P	U	U	P	Provisional grey belt
HW057	S	W	W	C							Not grey belt
HW058	M	W	W	C							Not grey belt
HW059-a	W	W	W	P	U	U	U	U	U	P	Provisional grey belt
HW059-b	M	W	W	U	U	U	P	P	U	P	Provisional grey belt
HW059-c	S	W	W	C							Not grey belt
HW060	M	W	W	C							Not grey belt
HW061	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
HW062	S	W	W	U	U	U	P	U	U	P	Not grey belt
HW063-a	M	W	W	U	U	U	P	U	U	P	Provisional grey belt
HW063-b	S	W	W	U	U	U	P	U	U	P	Not grey belt
HW064	S	M	W	U	U	U	P	U	P	P	Not grey belt
HW065	S	M	W	U	U	U	P	U	P	P	Not grey belt
HW066	M	W	W	U	U	U	P	U	C		Not grey belt
HW067	M	M	W	U	U	U	P	U	P	U	Provisional grey belt
HW068	S	S	W	U	U	U	P	U	U*	U	Not grey belt
HW069	S	W	W	U	U	U	P	U	U	U	Not grey belt
HW070	M	W	W	U	U	C					Not grey belt
HW071	S	S	W	U	U	U	P	U	P	U	Not grey belt
HW072	S	M	W	U	U	U	P	U	C		Not grey belt
HW073	S	M	W	U	U	U	U	C			Not grey belt
HW074	S	M	W	U	U	U	U	P	U	U	Not grey belt
HW075	M	W	W	U	U	U	U	U	U	U	Grey belt
HW076	S	W	W	U	U	U	U	C*			Not grey belt
HW077	S	M	W	U	U	U	U	U*	U	U	Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
HW078	M	W	W	U	U	U	U	U	P	U	Provisional grey belt
HW081	M	W	W	C							Not grey belt
HW082	S	W	W	C							Not grey belt
HW083-a	M	W	W	C							Not grey belt
HW083-b	M	W	W	U	U	U	U	P	U	P	Provisional grey belt
HW084	S	W	W	C							Not grey belt
HW085	S	W	W	C							Not grey belt
HW086	M	W	W	C							Not grey belt
HW087	S	W	W	C							Not grey belt
HW088	S	W	W	C							Not grey belt
HW089	M	W	W	C							Not grey belt
HW090-a	S	W	W	U	U	U	U	C			Not grey belt
HW090-b	S	W	W	C							Not grey belt
HW091	W	W	W	C							Not grey belt
HW092	M	W	W	C							Not grey belt
HW093	S	W	W	C							Not grey belt
HW094	S	W	W	C							Not grey belt
HW095	S	W	W	C							Not grey belt
HW096	M	W	W	C							Not grey belt
HW097	M	W	W	C							Not grey belt
HW098	S	W	W	C							Not grey belt
HW099	M	W	W	C							Not grey belt
HW100	W	W	W	P	U	U	U	U	U	U	Provisional grey belt
HW101	M	W	W	C							Not grey belt
HW102	S	W	W	C							Not grey belt
HW103	S	W	W	C							Not grey belt
HW104	M	W	W	C							Not grey belt
HW105	S	W	W	U	U	U	P	U	U	P	Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
HW106	S	W	W	C							Not grey belt
I001	W	M	W	U	U	U	U	U*	P	U	Provisional grey belt
I002	W	M	W	U	U	C*					Not grey belt
I003	W	M	W	U	U	U	U	U	U	U	Grey belt
I004	W	M	W	U	U	U	U*	U	P	U	Provisional grey belt
I005-a	W	S	W	U	U	U	U*	U	U*	U	Not grey belt
I005-b	W	M	W	U	U	U	U	U	P	U	Provisional grey belt
I005-c	W	W	W	U	U	U	U	U	U	U	Grey belt
IH001	W	W	W	U	U	U	P	U*	U	U	Provisional grey belt
IH002	W	W	W	U	U	U	U	U*	U*	U	Grey belt
IH003	W	W	W	U	U	U	U	U	U	U	Grey belt
IH004	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
IH005	W	M	W	U	U	U	C				Not grey belt
IV001	W	W	W	C							Not grey belt
LB001	M	W	W	U	U	U	P	U	U*	U	Provisional grey belt
LC001	W	W	W	C							Not grey belt
LC002	W	W	W	C							Not grey belt
LC003	W	W	W	C							Not grey belt
LC004	W	M	W	C							Not grey belt
LC005-a	W	W	W	U	U	U	P	P	U	P	Provisional grey belt
LC005-b	W	W	W	U	U	U	U	P	U	P	Provisional grey belt
LC006-a	W	M	W	C							Not grey belt
LC006-b	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
LC007	W	S	W	C							Not grey belt
LC008	W	W	W	C							Not grey belt
LC009	W	M	W	C							Not grey belt
LC010	W	W	W	C							Not grey belt
LC011-a	W	S	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
LC011-b	W	W	W	C							Not grey belt
LC012	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
LC013	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
LC014	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
LC015-a	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
LC015-b	W	W	W	U	U	U	P	U*	P	U	Provisional grey belt
LC016	W	W	W	U	U	U	P	C			Not grey belt
LC017-a	W	W	W	U	U	U	P	U*	U*	U	Provisional grey belt
LC017-b	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
LC017-c	W	W	W	U	U	U	P	U	U*	U	Provisional grey belt
LC018-a	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
LC018-b	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
LC019	W	M	W	U	U	U	P	P	P	P	Provisional grey belt
LE001	W	W	W	C							Not grey belt
LE002	W	W	W	C							Not grey belt
LE003	W	W	W	C							Not grey belt
LE004	W	W	W	C							Not grey belt
LE005	W	W	W	C							Not grey belt
LE006	W	W	W	C							Not grey belt
LE007	W	W	W	C							Not grey belt
LE008	W	W	W	C							Not grey belt
LE009	W	W	W	C							Not grey belt
LO001	M	W	W	U	U	U	U	U	U*	U	Grey belt
LO002	M	S	W	U	U	U	U	U	P	U	Not grey belt
LO003	M	M	W	U	U	C					Not grey belt
LO004	M	M	W	U	U	U*	U*	U	P	U	Provisional grey belt
MB001	W	W	W	C							Not grey belt
MB002	W	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
MB003	W	W	W	C							Not grey belt
MB004	W	W	W	C							Not grey belt
MB005	W	W	W	C							Not grey belt
MB006	W	W	W	C							Not grey belt
MB007	W	W	W	C							Not grey belt
MB008	W	M	W	C							Not grey belt
MB009	W	W	W	C							Not grey belt
MH001	M	W	W	U	U	C					Not grey belt
MH002	W	W	W	U	U	C					Not grey belt
ML001	S	W	W	C							Not grey belt
ML002	M	W	W	C							Not grey belt
ML003	M	W	W	C							Not grey belt
ML004	M	W	W	C							Not grey belt
ML005	S	W	W	C							Not grey belt
ML006	S	W	W	C							Not grey belt
ML007	S	W	W	C							Not grey belt
ML008	M	W	W	C							Not grey belt
ML009	S	M	W	U	U	U	P	U	P	P	Not grey belt
ML010	S	M	W	U	U	C					Not grey belt
ML011	S	M	W	U	U	C					Not grey belt
ML012	S	W	S	U	U	C					Not grey belt
ML013	M	W	W	C							Not grey belt
ML014	S	W	W	C							Not grey belt
ML015	S	W	W	C							Not grey belt
ML016	M	W	W	C							Not grey belt
ML017	M	W	W	C							Not grey belt
ML018	S	W	W	C							Not grey belt
ML019	S	W	W	U	U	U	P	U	U	P	Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
ML020	M	W	W	U	U	U	P	U	U	P	Provisional grey belt
ML021	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
ML022	M	W	W	C							Not grey belt
ML023	M	W	W	C							Not grey belt
ML024	M	W	W	C							Not grey belt
ML025	S	W	W	C							Not grey belt
ML026	S	W	W	C							Not grey belt
ND001	W	W	W	U	U	P	C				Not grey belt
ND002	M	W	W	U	U	P	P	U*	U*	U	Provisional grey belt
ND003	M	W	W	U	U	U	P	U	U*	U	Provisional grey belt
NWA001	W	W	W	C							Not grey belt
NWA002	W	W	W	C							Not grey belt
NWA003	W	W	W	C							Not grey belt
NWA004	W	W	W	C							Not grey belt
NWA005	W	W	W	C							Not grey belt
NWA006	W	W	W	C							Not grey belt
NWA008	W	W	W	C							Not grey belt
NWA009	W	W	W	C							Not grey belt
NWA010	W	W	W	C							Not grey belt
NWA011	W	W	W	C							Not grey belt
NWA012	W	W	W	C							Not grey belt
NWA013	W	W	W	C							Not grey belt
NWA014	W	W	W	C							Not grey belt
NWA015	W	W	W	C							Not grey belt
NWA016	W	W	W	C							Not grey belt
NWA017	W	W	W	C							Not grey belt
NWA018-a	W	W	W	C							Not grey belt
NWA018-b	W	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
NWA018-c	W	W	W	C							Not grey belt
OGB1	W	W	W	C							Not grey belt
OGB100	S	W	W	U	U	U	P	U	U	U	Not grey belt
OGB10a	W	W	M	C							Not grey belt
OGB10b-1	W	M	W	C							Not grey belt
OGB10b-2	W	W	W	C							Not grey belt
OGB10c	W	M	W	C							Not grey belt
OGB10d	W	M	M	C							Not grey belt
OGB10e-1	W	M	M	C							Not grey belt
OGB10e-2	W	W	M	U	U	U	P	U	P	P	Provisional grey belt
OGB11-1	W	M	W	C							Not grey belt
OGB11-2	W	M	W	U	U	U	P	U*	P	P	Provisional grey belt
OGB11-3	W	M	W	U	U	U	P	C			Not grey belt
OGB11-4	W	W	W	C							Not grey belt
OGB11-5	W	W	W	P	U	U	P	U	U	P	Provisional grey belt
OGB12	W	M	W	C							Not grey belt
OGB13b	W	M	W	U	U	U	P	P	P	P	Provisional grey belt
OGB14a-1	W	W	W	U	U	U	P	P	U*	P	Provisional grey belt
OGB14a-2	W	W	W	C							Not grey belt
OGB14a-3	W	W	W	C							Not grey belt
OGB14a-4	W	W	W	U	U	U	P	U	P	P	Provisional grey belt
OGB14a-5	W	W	W	P	U	U	P	U*	U*	P	Provisional grey belt
OGB14a-6	W	W	W	U	U	U	P	U	P	P	Provisional grey belt
OGB14b	W	M	W	C							Not grey belt
OGB15	W	W	W	U	U	U	P	U	P	P	Provisional grey belt
OGB16b	W	W	W	C							Not grey belt
OGB17	W	W	W	C							Not grey belt
OGB18a	W	M	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
OGB18b	M	M	W	C							Not grey belt
OGB19-1	W	W	W	C							Not grey belt
OGB19-2	W	M	M	C							Not grey belt
OGB20	W	M	W	C							Not grey belt
OGB21a-1	W	S	W	C							Not grey belt
OGB21a-2	W	W	W	C							Not grey belt
OGB21b	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
OGB22a-1	W	W	W	C							Not grey belt
OGB22a-2	W	M	W	C							Not grey belt
OGB22a-3	W	M	W	U	U	U	P	P	U	P	Provisional grey belt
OGB24b	W	M	M	C							Not grey belt
OGB25a	W	W	W	C							Not grey belt
OGB25b	W	M	W	C							Not grey belt
OGB25c	W	W	W	C							Not grey belt
OGB26	W	W	W	C							Not grey belt
OGB27-1	W	W	W	U	U	U	U	P	U	U	Provisional grey belt
OGB27-2-a	W	S	W	U	U	U	P	P	U	U	Not grey belt
OGB27-3-a	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
OGB27-3-b	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
OGB28	W	S	W	C							Not grey belt
OGB29	W	S	W	C							Not grey belt
OGB2a	W	W	W	C							Not grey belt
OGB2b	W	W	W	C							Not grey belt
OGB3	W	W	W	C							Not grey belt
OGB32a	W	S	W	C							Not grey belt
OGB32b-1	W	M	W	C							Not grey belt
OGB32b-2	W	W	W	U	U	U	C				Not grey belt
OGB33a	W	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
OGB33b	W	W	W	C							Not grey belt
OGB33c-1	W	M	W	C							Not grey belt
OGB33c-2	W	W	W	C							Not grey belt
OGB33d	W	M	W	C							Not grey belt
OGB34	W	W	W	C							Not grey belt
OGB36-1	W	S	W	C							Not grey belt
OGB36-2	W	M	W	C							Not grey belt
OGB36-3	W	M	W	C							Not grey belt
OGB37	W	M	W	C							Not grey belt
OGB38a-1	W	M	W	U	U	U	U	U*	U*	P	Provisional grey belt
OGB38a-2	W	W	W	U	U	U	U	P	U	U	Provisional grey belt
OGB38b-1	W	M	W	C							Not grey belt
OGB38b-2	W	M	W	C							Not grey belt
OGB39	W	W	W	C							Not grey belt
OGB4	W	W	W	C							Not grey belt
OGB40a-1	W	W	W	U	U	U	U	C			Not grey belt
OGB40a-2	W	W	W	U	U	U	P	U*	U	U	Provisional grey belt
OGB40b-1	W	W	W	U	U	U	U	P	U	U	Provisional grey belt
OGB40b-2	W	W	W	U	U	U	C				Not grey belt
OGB40b-3-a	W	W	W	U	U	U	P	P	U	U	Provisional grey belt
OGB40b-3-b	W	W	W	U	U	U	U*	P	U	U	Provisional grey belt
OGB41a-1	W	W	W	U	U	U	P	U*	U	U	Provisional grey belt
OGB41a-2	W	W	W	U	U	U	P	C			Not grey belt
OGB41a-3	W	M	W	U	U	U	P	P	C		Not grey belt
OGB41a-4	W	M	W	U	U	U	U	U	U*	U	Grey belt
OGB41b-1	W	S	W	U	U	U	U	U	U	U	Not grey belt
OGB41b-2	W	M	W	U	U	U	U	U	U	U	Grey belt
OGB41b-3	W	S	W	U	U	U	U	U	P	U	Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
OGB42-1	W	S	W	C							Not grey belt
OGB42-2-a	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
OGB42-2-b	W	W	W	C							Not grey belt
OGB43a	W	W	W	C							Not grey belt
OGB43b	W	W	W	C							Not grey belt
OGB43c	W	W	W	U	U	U	C				Not grey belt
OGB43c-1	W	M	W	C							Not grey belt
OGB43c-2	W	M	W	C							Not grey belt
OGB43d	W	M	W	C							Not grey belt
OGB43e	W	S	W	C							Not grey belt
OGB44a-1	W	W	W	U	U	U	U	U*	U	U	Grey belt
OGB44a-2	W	W	W	U	U	U	U	C			Not grey belt
OGB44a-3	W	W	W	U	U	U	U	P	U	U	Provisional grey belt
OGB44b-1	W	W	W	U	U	U	U	C			Not grey belt
OGB44b-2	W	W	W	U	U	U	U	U*	U*	U	Grey belt
OGB46a	W	M	W	C							Not grey belt
OGB46b-1	W	M	W	U	U	U	U	U	U	P	Provisional grey belt
OGB46b-2	W	M	W	U	U	U	U	U	U	P	Provisional grey belt
OGB46b-3	W	M	W	U	U	U	U	U	U	P	Provisional grey belt
OGB46b-4	W	W	W	U	U	U	U	U	U	P	Provisional grey belt
OGB47a	W	W	W	U	U	U	P	P	U	U	Provisional grey belt
OGB47b-1-a	W	W	W	U	U	U	P	P	U*	U	Provisional grey belt
OGB47b-1-b	W	W	W	U	U	U	P	P	P	U	Provisional grey belt
OGB47b-2	W	W	W	U	U	U	P	U*	U	U	Provisional grey belt
OGB47b-3	W	M	W	U	U	U	P	C*			Not grey belt
OGB47b-4	W	M	W	U	U	U	P	C			Not grey belt
OGB5	W	W	W	C							Not grey belt
OGB50a	W	M	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
OGB50b-1	W	W	W	C							Not grey belt
OGB50b-2	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
OGB50b-3	W	W	W	U	U	U	P	U	U*	P	Provisional grey belt
OGB50b-4	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
OGB50b-5	W	W	W	U	U	U	P	U	P	P	Provisional grey belt
OGB52a-1	W	S	W	C							Not grey belt
OGB52a-2	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
OGB52a-3	W	M	W	U	U	U	P	U	U	P	Provisional grey belt
OGB52a-4	W	S	W	U	U	U	P	U	U	P	Not grey belt
OGB52a-5	W	S	W	U	U	U	P	U	U	U	Not grey belt
OGB54-1	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
OGB54-2	W	M	W	U	U	U	P	P	P	U	Provisional grey belt
OGB55	W	S	W	U	U	U	P	U	P	U	Not grey belt
OGB56-1	W	M	W	U	U	U	P	U	P	U	Provisional grey belt
OGB56-2	W	M	W	U	U	U	C				Not grey belt
OGB56-3	W	M	W	U	U	U	C*				Not grey belt
OGB58b-1	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
OGB58b-2	W	M	W	U	U	U	P	U*	U*	U	Provisional grey belt
OGB58b-3	W	W	W	U	U	U	P	P	U	U	Provisional grey belt
OGB58b-4	W	M	W	U	U	U	P	C*			Not grey belt
OGB58b-5	W	W	W	U	U	U	P	P	P	U	Provisional grey belt
OGB58b-6	W	W	W	U	U	U	P	C			Not grey belt
OGB58b-7	W	M	W	U	U	U	P	P	U	U	Provisional grey belt
OGB59-1	W	M	W	U	U	U	C				Not grey belt
OGB59-2	W	M	W	U	U	U	C				Not grey belt
OGB60-1	W	M	W	U	U	U	U	U	P	P	Provisional grey belt
OGB60-2	W	M	W	U	U	U	U	U	C*		Not grey belt
OGB60-3	W	M	W	U	U	U	U	U	P	P	Provisional grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
OGB6-1	W	M	W	C							Not grey belt
OGB6-2	S	M	W	C							Not grey belt
OGB63-1	W	M	W	U	U	U*	P	U*	U	U	Provisional grey belt
OGB63-2	W	M	W	U	U	C					Not grey belt
OGB63-3-a	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
OGB63-3-b	W	W	W	U	U	U	U*	U	U	U	Grey belt
OGB63-4	W	M	W	U	U	U	C*				Not grey belt
OGB64b	W	W	W	U	U	U	P	C*			Not grey belt
OGB65a	W	M	W	U	U	U	U	U	U*	U	Grey belt
OGB65b	W	M	W	U	U	U	P	P	P	U	Provisional grey belt
OGB66-1	W	W	W	U	U	C					Not grey belt
OGB66-2	W	M	W	U	U	U	P	U	P	U	Provisional grey belt
OGB66-3-a	W	W	W	U	U	U	P	U	C		Not grey belt
OGB66-3-b	W	W	W	U	U	U	U*	U	P	U	Provisional grey belt
OGB66-3-c	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
OGB70	W	M	W	U	U	U	C				Not grey belt
OGB71	W	M	W	U	U	U	C				Not grey belt
OGB73-1	W	W	W	U	U	P	P	U	C		Not grey belt
OGB73-10	W	M	W	U	U	U	P	U	P	U	Provisional grey belt
OGB73-11	W	M	W	U	U	U	P	U	P	U	Provisional grey belt
OGB73-12	W	W	W	U	U	U	P	C			Not grey belt
OGB73-13	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
OGB73-14	W	W	W	U	U	U	P	U	C		Not grey belt
OGB73-15	W	W	W	U	U	U	P	P	P	U	Provisional grey belt
OGB73-2	S	M	W	U	U	U	P	P	C*		Not grey belt
OGB73-3	W	M	W	U	U	C					Not grey belt
OGB73-4	W	S	W	U	U	P	P	U	P	U	Not grey belt
OGB73-5	W	M	W	U	U	U	P	U	C		Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
OGB73-6	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
OGB73-7	W	M	W	U	U	U	P	U	P	U	Provisional grey belt
OGB73-8	W	W	W	U	U	U	P	P	P	U	Provisional grey belt
OGB73-9	W	W	W	U	U	U	P	P	P	U	Provisional grey belt
OGB74-2	W	W	W	U	U	U	P	C			Not grey belt
OGB74-3	W	W	W	U	U	P	P	P	P	U	Provisional grey belt
OGB75-1	W	W	W	U	U	U	C				Not grey belt
OGB75-2	W	W	W	U	U	U	P	U*	U	U	Provisional grey belt
OGB75-3	W	W	W	U	U	U	C				Not grey belt
OGB7a-1	W	M	W	U	U	U	P	U*	P	P	Provisional grey belt
OGB7a-2	W	M	W	U	U	U	P	P	U*	P	Provisional grey belt
OGB7b-1	W	M	W	U	U	U	P	U*	C		Not grey belt
OGB7b-2-a	W	W	W	U	U	U	P	U	C*		Not grey belt
OGB7b-2-b	W	M	W	C							Not grey belt
OGB7b-3	W	S	W	C							Not grey belt
OGB81-1	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
OGB81-2	S	W	W	U	U	U	P	P	P	U	Not grey belt
OGB83	S	M	W	U	U	C					Not grey belt
OGB85b	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
OGB87a	W	W	W	U	U	U	P	C*			Not grey belt
OGB87b	W	M	W	U	U	U	U*	U	U*	U	Grey belt
OGB88-1	W	W	W	U	U	U	P	P	C*		Not grey belt
OGB88-2	W	W	W	U	U	P	U*	U	P	U	Provisional grey belt
OGB88-3	W	M	W	U	U	C					Not grey belt
OGB88-4	W	M	W	U	U	U	U	U	P	U	Provisional grey belt
OGB88-5	W	W	W	U	U	U	U	U*	U*	U	Grey belt
OGB8a	W	W	M	C							Not grey belt
OGB8c-1	W	S	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
OGB8c-2	W	S	W	C							Not grey belt
OGB8c-3	W	M	W	C							Not grey belt
OGB8d-1	W	M	W	C							Not grey belt
OGB8e-1	W	W	W	C							Not grey belt
OGB8e-2	W	W	W	U	U	U	P	P	U*	P	Provisional grey belt
OGB8f-1	W	W	W	C							Not grey belt
OGB8f-2	W	W	W	U	U	U	P	U	U	P	Provisional grey belt
OGB8g	W	W	W	C							Not grey belt
OGB91	M	M	W	U	U	C					Not grey belt
OGB93-1	W	W	W	U	U	U	U*	U	U	U	Grey belt
OGB93-2	M	M	W	U	U	C*					Not grey belt
OGB98	W	M	W	U	U	C					Not grey belt
OGB99	S	W	W	U	U	U	U	U	U*	U	Not grey belt
OGB9a	W	W	W	C							Not grey belt
OGB9b-1	W	W	W	C							Not grey belt
OGB9b-2	W	W	W	C							Not grey belt
OGB9c	W	M	W	C							Not grey belt
OGB9d-1	W	M	W	C							Not grey belt
OGB9d-2	W	W	W	C							Not grey belt
OGB9e-1	W	M	W	C							Not grey belt
OGB9e-2	W	W	W	C							Not grey belt
OGB9f-1	W	M	W	C							Not grey belt
OGB9f-2	W	W	W	C							Not grey belt
OGB9g	W	W	W	C							Not grey belt
OGB9h	W	M	W	C							Not grey belt
PGM001	M	W	W	C							Not grey belt
PGM002	M	W	W	C							Not grey belt
PGM003	M	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
PGM004	S	W	W	C							Not grey belt
PGM005	S	W	W	C							Not grey belt
PGM006	M	W	M	C							Not grey belt
PGM007	M	W	S	C							Not grey belt
PGM008	W	W	W	C							Not grey belt
PGM009	M	W	W	C							Not grey belt
PGM010	S	W	W	C							Not grey belt
PGM011	M	W	W	C							Not grey belt
PGM012	S	W	W	C							Not grey belt
PGM013	M	W	W	C							Not grey belt
PGM014	M	W	W	C							Not grey belt
PGM015	M	W	W	C							Not grey belt
PGM016	M	W	W	C							Not grey belt
PGM017	S	W	W	C							Not grey belt
PGM018	W	W	W	C							Not grey belt
PGM019	M	W	W	C							Not grey belt
PGM020	S	W	W	C							Not grey belt
PGM021	M	W	W	C							Not grey belt
PGM022	S	W	W	C							Not grey belt
PGM023	M	W	W	C							Not grey belt
PGM024	M	W	W	C							Not grey belt
PGM025	M	W	W	C							Not grey belt
PGM026	S	W	W	C							Not grey belt
PGM027	M	W	W	C							Not grey belt
PGM028	M	W	W	C							Not grey belt
PR001-a	M	W	W	C							Not grey belt
PR001-b	M	W	W	C							Not grey belt
PR002	M	W	W	C							Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
PR003	M	W	W	C							Not grey belt
PR004	S	W	W	C							Not grey belt
PR005	W	W	W	C							Not grey belt
PR006	S	W	W	C							Not grey belt
PR007	M	W	W	C							Not grey belt
PR008	M	W	W	C							Not grey belt
PR009	M	W	W	C							Not grey belt
RP001	W	M	W	U	U	U	U*	U	U	U	Grey belt
RP002	W	M	W	U	U	U	U*	U	U	U	Grey belt
RP003-a	W	M	W	U	U	U	U*	U	P	U	Provisional grey belt
RP003-b	W	M	W	U	U	U*	U*	U	U*	U	Grey belt
RP004	W	W	W	U	U	U	U*	U	U	U	Grey belt
RP005	W	M	W	U	U	C					Not grey belt
RP006	W	M	W	U	U	U	U*	U	U	U	Grey belt
RP007	M	W	W	U	U	U	U*	U	U	U	Grey belt
SC001	W	W	W	C							Not grey belt
SC002	W	W	W	C							Not grey belt
SC003	W	W	W	C							Not grey belt
SC004	W	W	W	C							Not grey belt
SC005	W	W	W	C							Not grey belt
SG001	W	M	W	U	U	U	C				Not grey belt
SG002-a-a	W	M	W	U	U	U	P	U	P	U	Provisional grey belt
SG002-a-b	W	W	W	U	U	U	P	U*	P	U	Provisional grey belt
SG002-b	W	W	W	U	U	U	P	C			Not grey belt
SG003	W	W	W	U	U	U*	P	P	U	U	Provisional grey belt
SG004	W	W	W	U	U	U	P	P	U	U	Provisional grey belt
SG005	W	M	W	C							Not grey belt
SL001	M	W	W	U	U	U	P	U	C		Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
SL002	S	M	W	U	U	U	P	U	P	U	Not grey belt
SL003-a	M	S	W	U	U	C					Not grey belt
SL003-b	W	M	W	U	U	U	P	U	U	U	Provisional grey belt
SL004	S	S	W	U	U	U	P	U	P	U	Not grey belt
SL005	M	M	W	U	U	U	P	U	U	U	Provisional grey belt
SL006	M	W	W	U	U	U	P	U	U	U	Provisional grey belt
SL007	S	M	W	U	U	U	P	U	P	U	Not grey belt
SL008	M	W	W	U	U	U	P	U	P	U	Provisional grey belt
SL009	W	S	S	U	U	U	P	U	C		Not grey belt
SL010	S	W	W	U	U	U	P	U	P	U	Not grey belt
SL011	M	W	W	U	U	U	P	U	P	U	Provisional grey belt
SL012	M	W	W	U	U	U	P	U	U	U	Provisional grey belt
SL013	M	W	W	U	U	U	P	U	U*	U	Provisional grey belt
SL014	S	W	W	U	U	U	P	P	P	U	Not grey belt
SL015	M	W	W	U	U	U	P	U	U	U	Provisional grey belt
SL016	S	W	W	U	U	U	P	U	U*	U	Not grey belt
SL017	M	M	W	U	U	U	P	U	P	U	Provisional grey belt
SL018	W	S	W	U	U	U	P	U	P	U	Not grey belt
SL019	M	W	W	U	U	U	P	U*	P	U	Provisional grey belt
SL020	M	W	W	U	U	U	P	U	P	U	Provisional grey belt
SL021	M	S	W	U	U	U	P	U	P	U	Not grey belt
SL022	W	S	W	U	U	U	P	U	C		Not grey belt
SL023	M	M	W	U	U	U	P	U*	C*		Not grey belt
SL024	M	W	W	U	U	U	P	U	P	U	Provisional grey belt
SL025	M	W	W	U	U	U	P	U	P	U	Provisional grey belt
SL026	S	W	W	U	U	U	P	U	C*		Not grey belt
SL027	M	W	W	U	U	U	P	U	P	U	Provisional grey belt
SL028	S	W	W	U	U	U	P	U	U*	U	Not grey belt

AA	Purpose A	Purpose B	Purpose D	NL	LGS	FR	BD	IH	HE	NLS	Conclusion
SL029	M	W	W	U	U	P	P	U	P	U	Provisional grey belt
SL030-a	M	W	W	U	U	U*	P	U	P	U	Provisional grey belt
SL030-b	M	W	W	U	U	P	U*	U	P	U	Provisional grey belt
SL031	S	M	W	U	U	U*	U*	U	U*	U	Not grey belt
SL032	S	M	W	U	U	U	U*	U	U	U	Not grey belt
SL033	S	M	W	U	U	U	U*	U	U	U	Not grey belt
SL034	S	M	W	U	U	U	U*	U	U*	U	Not grey belt
SP001-a	W	W	W	U	U	U	C				Not grey belt
SP001-b	W	W	W	U	U	U	C				Not grey belt
SP002	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
SP003	W	W	W	U	U	U	P	U	P	U	Provisional grey belt
SP004	W	W	W	U	U	U	P	U	U	U	Provisional grey belt
SP005	S	W	W	U	U	U	P	P	P	U	Not grey belt
SP006	W	W	W	U	U	U	C*				Not grey belt
SP007	W	W	W	U	U	U	C				Not grey belt
WD001	M	W	W	U	U	U	C				Not grey belt
WD002	M	W	W	U	U	U	C*				Not grey belt
WD003	M	W	W	U	U	U	P	U	U*	P	Provisional grey belt
WD004	W	M	W	U	U	U	P	P	P	P	Provisional grey belt
WD005	S	M	W	C							Not grey belt
WD006	M	W	M	C							Not grey belt
WD007	W	W	S	U	U	U	P	U	C*		Not grey belt
WD008	S	W	M	C							Not grey belt
WD009	M	W	S	P	U	U	P	U	C*		Not grey belt
WD010	M	W	W	C							Not grey belt
WD011	M	W	W	C							Not grey belt

# 7. Fundamentally undermining the remaining Green Belt

## 7.1. Introduction

7.1.1. This section deals with step five of the GBA method prescribed by the PPG:

*“Identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.”*

7.1.2. This step is of considerable importance in light of NPPF paragraph 146:

*“If [exceptional circumstances for Green Belt release have been established] authorities should review Green Belt boundaries... and propose alterations to meet [housing needs] in full, **unless** the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”*

7.1.3. There is no further guidance regarding how to undertake the exercise, but from Figure 6.1 it is clear that there is a need to consider the in-combination effects of releasing identified grey belt and provisional grey belt AAs for development, because there is a high degree of spatial clustering.

7.1.4. Further methodological points are as follows:

- There is a need to account for the primary Green Belt purpose excluded from work to identify grey belt, which is Purpose C (Assist in safeguarding the countryside from encroachment).
- Whilst the primary focus must be concerns regarding undermining the integrity of the Green Belt “across the plan area”, it is also reasonable to give consideration to concerns at functional scales within the study area.
- There is a need to consider risks with a long term perspective, i.e. with a view to avoiding impacts building-up incrementally. As part of this, the opening sentence of the NPPF section on Green Belt is of note:

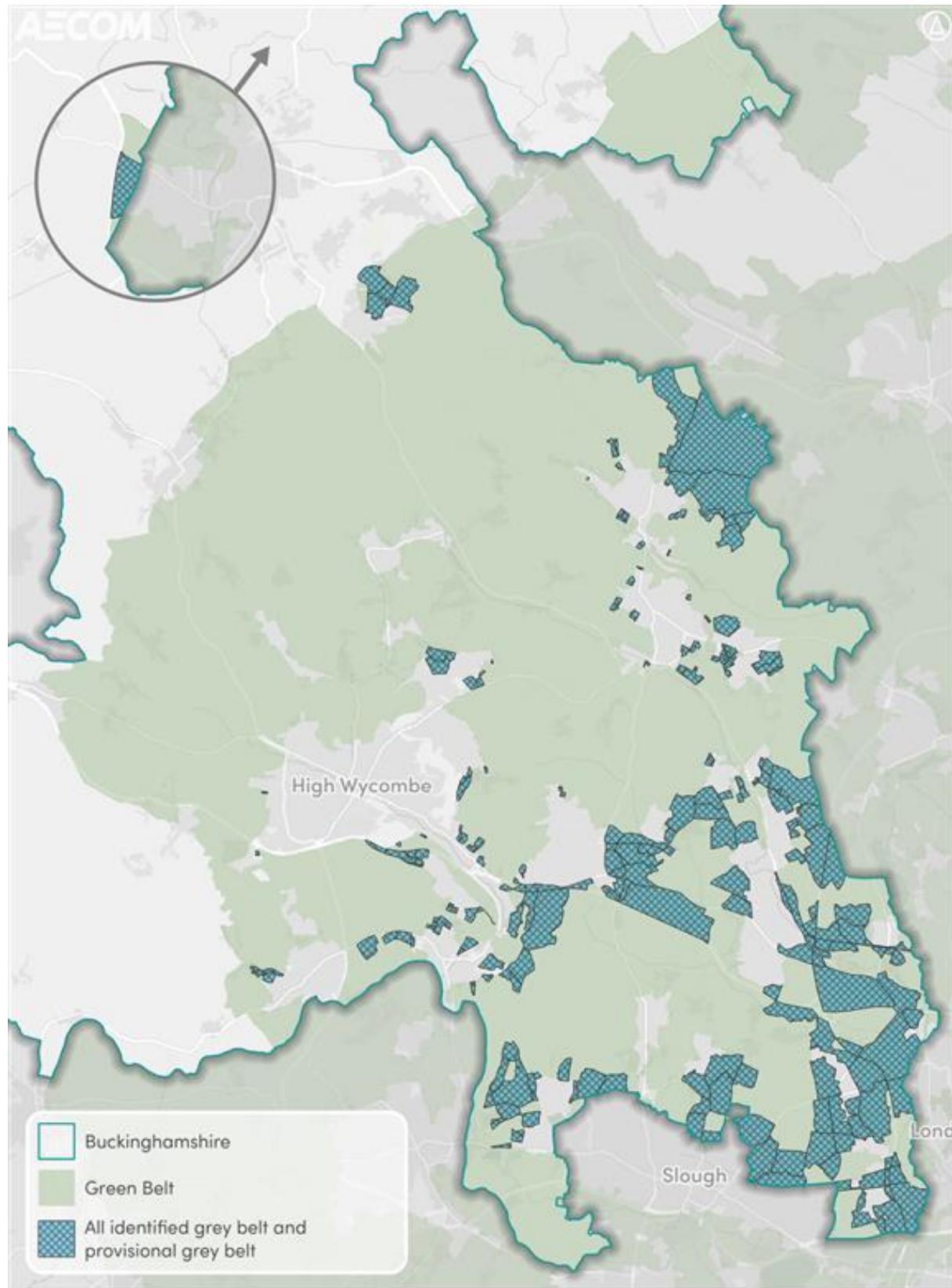
*“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

7.1.5. In light of the above, the methodological approach is to present a discussion of sub-areas within the study area in turn accounting for Figure 7.1, which shows both areas of identified grey belt and provisional grey belt.

7.1.6. It is important to be clear that there is **no realistic scenario** whereby all of these AAs are released for development; however, it is a hypothetical worst case scenario that forms a basis for discussion. In practice, it is the Local Plan that must consider locations for growth, and any decisions to allocate a site for development would account for this GBA and wider evidence / factors.

7.1.7. Finally, at the time of writing a draft new NPPF proposes removing footnote 7 constraint as a grey belt consideration which would lead to 87% of the study area being grey belt (Figure 5.5). However, it would not be appropriate to speculate on potential 'fundamentally undermining' concerns.

**Figure 7.1: All identified grey belt and provisional grey belt**



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## 7.2. Discussion of sub-areas

7.2.1. Sub-areas are discussed below in a broad geographical order.

### Leighton Buzzard

7.2.2. One of the three AAs here is provisional grey belt (it is provisionally constrained under 'biodiversity') whilst the other two AAs are not grey belt as they are judged to make a strong contribution to Purpose A.

7.2.3. The grey belt AA is associated with a distinct valley that is somewhat accessible via a footpath, such that there could be a degree of concern in terms of Purpose C, but the A4146 is an urbanising influence. Otherwise there are no concerns regarding fundamentally undermining the Green Belt, including recalling that this is the very edge of the London Green Belt.

### Wendover, Aston Clinton and Tring

7.2.4. Four adjacent AAs to the north of Tring are provisional grey belt (there are several potential footnote 7 concerns, including relating to the setting of the National Landscape, given the nearby escarpment). However, again there are no concerns regarding fundamentally undermining the Green Belt.

7.2.5. Having said this, there is a localised concern regarding undermining a modest area of Green Belt (associated with the canal) adjacent to the west of the four AAs, such that there is a clear case for ensuring that any strategic growth in this area is comprehensive rather than piecemeal. It can also be noted that proximity to the Ashridge SSSI component of the Chilterns Beechwoods SAC is a constraint in this area and potentially serves as a further reason for ensuring a comprehensive approach to growth, potentially with a view to delivering new Suitable Alternative Natural Greenspace (SANG).

7.2.6. Finally, there is the matter of the Green Belt gap between the three settlements, with the gap notably narrow between Aston Clinton and Tring, and then the gap between Aston Clinton / Tring and Wendover potentially sensitive on account of the Chilterns escarpment, including noting a long distance view (overlooking the canal) from the B4009. This again serves to highlight a need for any growth options to be considered with a strategic perspective, but there are no clear 'fundamentally undermining' concerns.

### Northwest of the study area

7.2.7. All AAs surrounding Princes Risborough, Stokenchurch, Walter's Ash / Naphill, Prestwood / Great Missenden and Great Kingshill fall within the National Landscape (NL) and so are not grey belt, plus a number of AAs around the two towns (Princes Risborough and Prestwood / Great Missenden) make a strong contribution to one of the three relevant Green Belt purposes.

7.2.8. This is mostly a rural area with large gaps between settlements. However, a potential sensitivity is around a sense of sprawl and/or loss of settlement separation northeast of High Wycombe noting the extent of built form along roads and noting that this is something of a raised plateau between the Wye Valley / Hughenden Valley to the west and the Misbourne Valley to the east.

## Chesham

7.2.9. The majority of the AAs surrounding the town that fall outside of the NL are provisional grey belt, but these are mostly modest in scale.

7.2.10. This leaves land to the east of Chesham where ‘provisional grey belt’ is the conclusion for a large collection of AAs. This is an extensive plateau just outside the NL but nonetheless associated with the Chilterns dip slope between the Chess Valley to the west and the Bulbourne Valley to the east. There are some containing features, including footnote 7 constraints and valued areas of settlement, but overall containment is challenging. Regardless, it is difficult to suggest a ‘fundamentally undermining’ concern, given barriers to encroachment towards the Bulbourne Valley.

7.2.11. Finally, a strategic Green Belt consideration is in respect of the Chess Valley gap between Chesham and Amersham, recognising that: A) the valley is highly valued, including noting important long distance footpaths; B) the valley also extends along the edge of Amersham and Little Chalfont; and C) this is the northern extent of the Metropolitan Line corridor, which is a significant feature of the London Green Belt. However, it is difficult to envisage growth giving rise to a significant ‘fundamentally undermining’ concern, including given the extent of woodlands / common land and noting NL designation.

## Amersham and Little Chalfont

7.2.12. Several small AAs around the edge of Amersham are provisional grey belt and do not give rise to ‘fundamentally undermining’ concerns.

7.2.13. A key issue is then the narrow gap between Amersham and Little Chalfont, where any development options would need to be considered with a strategic perspective, i.e. to avoid incrementally impacting the gap over time. This is the watershed between the Chess Valley to the north and the Misbourne Valley to the south and, in particular, there is a need to guard against sprawl into and potentially along the Misbourne Valley.

7.2.14. With regards to Little Chalfont, three large areas of provisional grey belt are identified, but none give to a ‘fundamentally undermining’ concern:

- Northwest – a single large AA is identified as provisional grey belt which gives rise to a degree of concern in terms of the gap to Amersham and/or an incongruous form of development. Also, there are links to a prominent historic farm and the Chess Valley / NL to the north. However, it is noted that there is a recently permitted Suitable Alternative Natural Greenspace (SANG) in the north of the AA (PL/24/3925/FA), which reduces concerns.
- East – the majority of this area has planning permission or comprises existing residential development.
- Southwest – this is an important sector of land in the context of Little Chalfont, given ancient woodland and wider woodland priority habitat and some distinct heritage value. Also, this area is sensitive in that its southern edge is associated with the crest of the Misbourne Valley. However, there is containment by a valued dry valley (within the NL) to the south.

7.2.15. Finally, with regards to the gap to Chorleywood, this is again an important gap given the context of the Metropolitan Line corridor being a strategic feature of the London Green Belt. However, it is difficult to envisage any risks to the gap, particularly along the A404 corridor, as this is a sensitive sector of the NL linking to Chenies and the Chess Valley. The southern part of the gap is perhaps more fragile, but poor road connectivity is likely a barrier to growth, and, regardless, there are few 'fundamentally undermining' concerns, including noting the extent of woodlands across this area.

## Marlow

7.2.16. Discounting land within the River Thames flood zone, there is only one sector of land around the edge of Marlow that falls outside of the NL, namely a sector of land to the northwest, and the conclusion here is that most AAs are provisional grey belt. It can be noted that this conclusion is potentially marginal, in that there is risk of an incongruous projection of built form extending to Bovingdon Green, and there are important footnote 7 constraints in this area, most notably relating to biodiversity and setting of the NL. However, there are no 'fundamentally undermining' concerns.

7.2.17. There are two further important strategic considerations for Marlow:

- The gap to High Wycombe – is arguably somewhat fragile having accounted for Marlow Bottom and other inset built form. However, concerns are reduced in that: A) this land is within the NL; B) Marlow Bottom is contained within a wooded valley; C) it is difficult to envisage merging of Marlow and Marlow Bottom noting a ridge of raised land with a green infrastructure role and because this area is something of a gateway to the Chilterns; and D) land in the vicinity of the two road corridors is associated with long distance views across the Thames Valley.
- The gap to Bourne End – this is one of the more fragile settlement gaps in the study area, noting: A) this land falls outside of the NL; B) there is good road connectivity (which is not to say there is capacity on roads); C) Marlow Film Studios was recently granted planning permission within this gap (at the eastern edge of Marlow); D) the village of Little Marlow sits within the gap; E) there are limited strong boundaries and some of the land comprises former landfill; and F) the adjacent NL to the north is the far extent of the Chilterns dip slope (although there are also visual / landscape sensitivities on account of the River Thames corridor and Winter Hill to the south).

As such, there is a concern regarding fundamentally undermining this sector of the Green Belt, including noting that Bourne End etc to the east is already associated with linear built form and narrow settlement gaps. However, in practice it is difficult to envisage further expansion east beyond Marlow Film Studios or expansion west of Bourne End, including noting NL and River Thames sensitivities and the importance of Little Marlow.

7.2.18. Finally, points to note regarding the Purpose B assessment around Marlow are as follows: A) to the north and northeast of Marlow just one of the large AAs within the NL scores 'strong' having accounted for NL constraint and woodlands that would restrict any growth; and B) the two AAs stretching between Marlow and Bourne End directly north of the River Thames are not scored 'strong' for Purpose B because flood risk strongly restricts growth.

## High Wycombe

7.2.19. The town is strongly associated with the NL but several areas around the urban edge are excluded from the NL most notably:

- Holmer Green – two areas of land fall outside of the NL and considerations are: A) limited NPPF footnote 7 constraint; B) the potential for 'rounding off' (particularly the area to the north); and C) reasonable or strong boundaries (particularly the area to the south). However, a concern is that Holmer Green already represents something of an incongruous projection, and as discussed above, there is a potential concern regarding sprawl towards Prestwood / Great Missenden. Also, there is a need to guard against sprawl east along the A404 corridor (with the Misbourne Valley to the east).
- Southeast along the M40 / A40 / River Wye – this is a key area of Green Belt sensitivity within the study area, recognising that High Wycombe has extended along the Wye Valley – towards Bourne End at the confluence with the River Thames – as an 'extended finger'. Taking matters in turn:
  - West of Loudwater (north of the M40) – attention focuses on land to the east of Abbey Barn Lane, to the west of which land was removed from the Green Belt by the Wycombe Local Plan and has since been partly developed. This is a steep hill linking the Chilterns to the south with the Wye Valley to the north and is crossed by roads and public rights of way. The Wycombe Local Plan drew upon Abbey Barn Lane as a defensible Green Belt boundary, such that further expansion could generate a sense of 'sprawl'. Also, the edge of High Wycombe (Wycombe Marsh) is marked by woodland and the route of a former railway line. However, on the other hand, comprehensive growth in this sector could draw upon the M40 as a very strong containing feature.
  - South of Wooburn Moor – the gap to Flackwell Heath is narrow and the village is associated with a characteristic raised position in the landscape between two river valleys. Also, the current urban edge is defined by a former railway line. However, the gap comprises a steep hill associated with a golf course and significant woodland / mature trees that could help to frame and potentially contain development. Also, modern built form buffers the historic core of Flackwell Heath.
  - North of Loudwater – there are two small areas of land to the north of the railway that fall outside of the NL. Both areas include significant built form, but the area to the east gives rise to a concern regarding an incongruous finger of development and, in some places, there is a concern regarding being able to draw upon strong boundaries.
  - East of Loudwater (north of the M40) – this is the gap to Beaconsfield, but it is difficult to envisage fundamentally undermining this sector of the Green Belt given a series two dry valleys (separated by a ridgeline) associated with significant woodland and with clear green infrastructure value, including noting the adjacent NL. Also, the fact that the A40 is in a deep ([historic](#)) cutting to the east reduces coalescence concerns.

- North of Wooburn Green (south of the M40) – this is a key area for consideration in respect of both Purpose A (given the Wye Valley context) and Purpose B (the gap to Beaconsfield). There is an important distinction between the Wye Valley settlements and Beaconsfield / Holtspur on raised land to the north / east, including accounting for the A40 as a historic route to Oxford. Also, long distance views across and along the valley are constraint despite this land falling outside of the NL. However, the M40 and associated screening is a major separating feature, and it is difficult to envisage sprawl towards Wooburn Green, including as the B4440 is a containing feature. Overall, the Purpose A and Purpose B sensitivities suggest a need to ensure a strategic approach to any growth in this area.
- South of Wooburn Green – both Purpose A and Purpose B are strategic considerations because of the existing ‘extended finger’ of development extending out from High Wycombe along the Wye Valley ([historic mapping](#) shows distinct settlements, linked to riverside industry, which then merged in the 20th century). Steeply rising valley sides could assist with containment but are equally a landscape constraint. Overall, given the range of features in this area that could be drawn upon to frame and contain any growth there are limited concerns around fundamentally undermining the Green Belt.

7.2.20. Elsewhere around High Wycombe land falls within the NL but regardless there are few concerns around fundamentally undermining the Green Belt, including given steep topography, woodland and heritage assets. Considerations are:

- South – the gap to Marlow has already been discussed above, but to elaborate here it is appropriate to additionally note Booker, which is the one area where the southern edge of High Wycombe has extended beyond the M40. It is noted that Wycombe Air Park falls outside of the NL but were there to be development there would be limited concerns around sprawl either to the west (Lane End) or south (Marlow) given woodland and topography / long distance views including across the Thames Valley.
- East – the gap to Beaconsfield mostly comprises land steeply undulating land within the NL that is highly accessible via a dense network of footpaths and bridleways, including linking to the popular destinations of Penn and Forty Green. However, in the north of this sector there is near continuous low density washed over built form stretching between Penn (at the edge of High Wycombe) and Knotty Green (at the edge of Beaconsfield).

## Bourne End / Wooburn Town

7.2.21. The combined settlement is classified as a town but not a large built-up area, such that Purpose B applies but not Purpose A.

7.2.22. Beginning with Purpose B considerations, attention focuses on the gap to Flackwell Heath as the gap to Wooburn Green has already been discussed. The gap is very fragile in places, on account of washed over built form, but this does not translate into concerns around fundamentally undermining the Green Belt, including as any development would likely be limited and there would be potential to draw upon topography and woodlands for containment.

7.2.23. With regards to Purpose A, whilst this does not strictly apply, the risk of sprawl fundamentally undermining the Green Belt is nonetheless a consideration. In this regard, attention focuses on land to the east, given the NL and Thames flood zone to the west, and considerations are:

- Northeast – it could be said that development could achieve something of a rounding-off, but this is less the case once account is taken of the very steep valley side. There could be a risk of sprawl along the Wye Valley, which is a significant feature within the Buckinghamshire Green Belt. However, there could be a need to deliver a SANG, given proximity to Burnham Beeches SAC, which might then be drawn upon as a containing feature and as a means of minimising landscape impacts.
- East – any growth would be limited and there are extensive containing features hence there are no ‘fundamentally undermining’ concerns.

## Beaconsfield

7.2.24. AAs around the northern edge of the town are constrained by the NL, but the majority of the southern half is subject to limited footnote 7 constraint, and there are limited concerns in respect of Purposes A and B, such that a high proportion of land is identified as provisional grey belt (all land falls within the Burnham Beeches zone of influence).

7.2.25. As such, it is important to consider potential in-combination impacts on the Green Belt and, in turn, any risk of fundamentally undermining the Green Belt:

- East (north of the A40) – there are a range of containing features, including the NL and extensive woodland (former [parkland](#)) largely associated with Beaconsfield Golf Club (established 1902). A concern is a finger of development extending out to the Wilton Park development, but to the east of Wilton Park is then significant ancient woodland. A final consideration is the risk a sense of continual built form along the lanes between Beaconsfield and Chalfont St. Giles, noting Seer Green (including the station) and extensive washed over built form, but concerns are limited.
- Southeast (south of the A40) – AAs in close proximity to Beaconsfield Old Town (i.e. land west of the A355) are very well contained and so do not generate a ‘fundamentally undermining’ concern. A key consideration is then land to the east of the A355, where a large AA is defined that comprises a high proportion of land recently used for minerals extraction followed by landfill and restoration. There is a risk of impacting the gap to Gerrards Cross, which is a strategic gap within the Buckinghamshire Green Belt (given fragile gaps elsewhere along the A40 corridor). However, concerns are reduced in the sense that: A) any development would likely be limited given proximity to Burnham Beeches; B) this land is not easily appreciated, including with limited visibility from the A40; C) there is considerable woodland that could be drawn upon for containment, and whilst this is not ancient woodland most is shown on [historic mapping](#); and D) there is a grade 2\* Registered Park and Garden to the east.

- South – to the north of the M40 a series of AAs are provisional grey belt but there are few ‘fundamentally undermining’ concerns, albeit the west of this sector is associated with the sensitive transition between Beaconsfield / Holtspur and the Wye Valley (as discussed above). Finally, to the south of the M40 there are few concerns given constraint / containing features, including Burnham Beeches and woodlands at the crest of the Wye Valley.

## Gerrards Cross

7.2.26. Whilst Gerrards Cross is considered in combination with Chalfont St. Peter for the purposes of assessment under Green Belt purposes A, B and D, as part of this current discussion it is appropriate to give Gerrards Cross stand-alone consideration, because of its association with the M40 / A40 / Chiltern Line.

7.2.27. Beginning to the west of Gerrards Cross, this is the gap to Beaconsfield and considerations are: A) to the north of the A40 a provisional grey belt AA generates limited ‘fundamentally undermining’ concerns, including noting containment by a valley and an ancient woodland (with an undulating, accessible and overall important sector of open countryside to the west); and B) south of the A40 is Bulstrode Park, which is an important asset and where the main house, associated with raised land and woodland, is a containing feature. Overall in this area, whilst it is difficult to suggest ‘fundamentally undermining’ concerns, there is an acknowledged need to consider potential in combination effects with any development south of the A40 to the west (specifically the aforementioned area of former minerals excavation / landfill).

7.2.28. Moving to the northeast, this is the River Misbourne corridor and former Chalfont Park ([locally designated](#)) now largely associated with Gerrards Cross Golf Club (established 1922). There are extensive constraints and containing features / characteristics, such that overall concerns are limited. There is also limited appreciation of the land from the A413. However, on the other hand, the A413 is a key route through Buckinghamshire linking to London.

7.2.29. Moving to the east of Gerrards Cross, an immediate point to note is the M25 as a strong containing feature, and containment is also provided by the River Misbourne corridor and significant areas of woodland including ancient woodland. However, there is a concern regarding a sense of sprawl / limited settlement separation along the A40 corridor, including noting Tatting End (where there is commercial development along the road) and the possibility of development to the east in proximity to the M40/A413 junction.

7.2.30. Finally, to the south of Gerrards Cross, there are no significant concerns noting the M40 and then the sensitive Alder Bourne corridor along with the historic village of Fulmer, plus there is containment to south in the form of Stoke Common, Black Park and Pinewood Studios. The only possible area of sensitivity is to the southwest of Gerrards Cross, noting the fairly narrow settlement gaps to Stoke Poges and Farnham Common, which then link closely to Slough. However, there is extensive woodland that would act to contain any development, plus the Hedgerley and Hedgerley Green conservation areas (also a candidate locally designated park/garden).

## Chalfont St. Peter and Chalfont St. Giles

7.2.31. The first matter for consideration is the fragile gap between the settlements, with this broadly comprising the following sectors:

- West of Narcot Lane – AAs are grey belt or provisional grey belt, and there is also a need to consider the gap to Beaconsfield. There are limited containing features other than Hodgemoor Woods SSSI to the north and Jordans as heritage asset to the south (most notably the grade 1 Quaker Meeting House). However, road links are likely a constraint to growth, including recognising the heritage sensitivity of Chalfont St. Giles.
- East of Narcot Lane / west of the A413 and River Misbourne – one of the AAs in this area makes a strong contribution to Purpose B, but there is a risk of incremental settlement expansion eroding the gap over time.
- The River Misbourne corridor – this is a highly valued river corridor easily appreciated from the A413, which is a key route through Buckinghamshire linking to London, hence it is difficult to envisage significant development. Having said this, it should be noted that land here falls outside of the NL.
- East of the A413 / west of Chesham Lane – the remaining gap is very narrow and so is not grey belt on account of contribution to Purpose B.
- East of Chesham Lane – there is a concern regarding the settlement separation being eroded over time. Also, large scale development in this sector could be associated with challenging containment and, in turn, a risk of sprawl. It is important to acknowledge raised land here as the watershed between two river corridors (the Misbourne and Colne), albeit the M25 is a containing feature as is the NL (but this is the far southern extent of the Chilterns dip slope, and Newlands Park within the NL is a developing as a new community that likely ‘looks’ northeast towards Chorleywood and Rickmansworth as well as south towards Chalfont St. Peter).

7.2.32. Focusing on Chalfont St. Giles itself, it is difficult to envisage significant growth giving rise to a ‘fundamentally undermining’ concern. However, a strategic consideration is the importance of the gap to Amersham recognising that, whilst this is a large gap within the NL, this is the sensitive A413 / River Misbourne corridor associated with extensive and valued views.

7.2.33. A further consideration is then the gap to Little Chalfont and Chorleywood, where there is a degree of sensitivity on account of washed over built form and a relatively flat topography (in the NL context), but there is extensive ancient woodland (also heritage assets, notably at the edge of Chalfont St. Giles) such that there are few ‘fundamentally undermining’ concerns.

7.2.34. Finally, focusing on Chalfont St. Peter, remaining sectors for discussion are:

- South of Welders Lane / north of the railway line – it is difficult to suggest any significant ‘fundamentally undermining’ concerns, given the extent of woodland (mostly ancient) and sensitivities associated with the two lanes through this area, including noting the grade 1 Quaker Meeting House.

- East – as per the discussion above regarding land east of Chesham Lane, there is a need to guard against sprawl beyond the confines of the Misbourne Valley. In the south of this area there is a degree of containment by ancient woodlands, former landfill and the M25.
- Southeast – this is the Chalfont Park area that has been discussed above. A large woodland (not ancient woodland) marks the settlement edge, and overall there are no significant ‘fundamentally undermining’ concerns.

## The Denham area (east of the M25)

### 7.2.35. Taking sub-areas from north to south:

- North of the railway line – this area is associated with Denham Golf Club Station and Denham Aerodrome. There is a need to guard against sprawl along the Colne Valley, but there is containment by ancient woodlands.
- South of the railway line – this area is constrained on account of the River Misbourne corridor and the Denham Conservation Area, which is a visitor destination and a key asset within the Colne Valley Regional Park. There may be some limited development potential in proximity to the station(s), but there are no ‘fundamentally undermining’ concerns of note.
- North of the M40 – this is an important area for consideration given links to the strategic road network. This is land between two river corridors and there is a need to guard against sprawl along the A413 corridor from the edge of London to Tatling End and on to Gerrards Cross. Development in the east of this area would avoid land to the west that is somewhat sensitive on account of heritage assets, a distinct valley and a network of lanes. However, there would be a risk of sprawl to the west over time.
- South of the M40 – the west of this sector is constrained by ancient woodland and the Alder Bourne corridor, whilst the east of this sector is constrained by flood risk (the confluence of the Alder Bourne and Colne). As such, attention focus on northern part of this sector, namely land in proximity to the M40 junction 1. Overall there is strong containment and few concerns around fundamentally undermining the Green Belt. However, there could be a risk of an extending finger of development projecting out from London, including one that extends beyond the River Colne.

## South of the study area

### 7.2.36. This is a very significant area for discussion, given a clear risk of development projecting out from London to Maidenhead via M4 / A4 / Elizabeth Line / Great Western Line corridor. Taking sectors from west to east:

- Southwest of Slough – there is strong containment provided by the M4 and the River Thames flood zone, such that there are no ‘fundamentally undermining’ concerns. It can also be noted that this is a rare instance of likely grade 1 agricultural land in Buckinghamshire.

- East of Maidenhead – the north of this sector is highly constrained (Cliveden, wider heritage assets, biodiversity sensitivities and ancient woodland), as is the west of this sector (the River Thames flood zone), hence attention focuses on land in the vicinity of Taplow station, where any strategic growth in this area must be carefully considered from a ‘fundamentally undermining’ perspective. Considerations are: A) at a local level, this is not only the east-west settlement gap as experienced from the A4, the railway line and a footpath (albeit appreciation is limited), but also an important south-north sector of rising land above a valued stretch of the River Thames and a link to a landscape on higher ground to the north with high heritage value;<sup>27</sup> and B) at a larger-than-local level, there is a case for ensuring that, even if the gap to London east of Slough is further eroded, a strong gap remains west of Slough such that the conurbation stops at the River Thames, and specifically at an important point on the Thames associated with the Maidenhead bridges, Cliveden, Taplow and Bray.
- Burnham – beginning to the west, whilst there is some potential for development that would amount to a rounding-off, the concern is development creep westwards and/or downhill over time that impacts the aforementioned important sector of Green Belt in the Taplow area. Also, there is a need to consider links between nationally and locally designated heritage assets in the Hitchambury area with the aforementioned landscape to the west associated with Taplow, Cliveden etc. Moving to the north of Burnham, whilst a concern is an incongruous finger of development, this does not necessarily translate into a ‘fundamentally undermining’ concern. There could be potential for growth to be reasonably well contained, including noting Burnham Beeches SAC. Finally, to the east of Burnham, this is one of a number of instances where there is potentially an opportunity to round-off the edge of Slough, but containing features are somewhat limited, and there is a need to consider the role of this sector as a green infrastructure corridor linking to Burnham Beeches, including noting woodland, heritage assets and a stream corridor.
- Farnham Royal / Farnham Common – attention focuses on the Farnham Royal area, given clear constraints affecting Farnham Common. However, there are few ‘fundamentally undermining’ concerns given the range of constraints / containing features, including locally designated East Burnham Park, a community park and then highly significant Stoke Park.
- Stoke Poges – the village plays an important role linking closely to Slough and sitting at the heart of a landscape associated with a wide range of assets. There could be some potential for growth south of the village that generates few ‘fundamentally undermining’ concerns, but this would need to be carefully considered with a strategic perspective, including accounting for a series of stream corridors. Attention focuses to the southeast, where there is extensive washed over built form, but there is heritage constraint.

<sup>27</sup> The gap is primarily experienced from the A4 Bath Road, although this experience is quite complex and overall limited given built form and infrastructure. A key feature is railway bridge (A4 underpass) in that: A) to the west of the bridge there are low density commercial uses that do not feel strongly part of Maidenhead, and through which there are glimpsed views of countryside to the north; and B) to the east of the bridge the view to the north is that of a steep railway embankment whilst to the south there are important views of open countryside. There are also some long distance views from higher ground, most notably from Taplow Court at the western edge of the area, but also from the Hitchambury area. Furthermore, there are brief views of Taplow Church from the railway line and some brief distant views of tall buildings in Slough and Maidenhead. However, there is limited sense of proximity to Maidenhead from the footpaths passing through the area, and impacts to settlement separation might be mitigated.

- Slough to Iver Heath – there is potentially an opportunity to round-off the edge of Slough in this area, drawing upon strong containment to the north (ancient woodlands and Black Park) and northeast (Langley Park), and drawing upon flood risk zones to frame growth. However:
  - North of this sector – growth to the north of the hospital would risk an incongruous built form (but former landfill might provide containment) whilst land adjacent to the A412 largely comprises former landfill.
  - East of this sector – Slough would be expanded beyond the canal and an industrial area (but this has already happened to a limited extent, and there are urbanising influences, including noting former landfill). Also, sprawl eastwards towards Iver would be a concern (discussed below) and there is a need to consider stream corridors and heritage.

With regards to Iver Heath itself, the village is mainly 20<sup>th</sup> century in origin and is notably associated with Pinewood Studios and good access to the strategic road network. This is a strategic location between Black Park / Langley Park, the Alder Bourne and the Colne Brook / Colne Valley, which highlights a need for a strategic approach to any growth, but it is difficult to suggest major 'fundamentally undermining' concerns. Any growth would need to consider containment to the southwest (Langley Park, the Colne Valley Trail and Iver Grove) and to the southeast (the Colne Brook Valley).

- Slough to Iver – expansion of Slough in this direction would risk an incongruous finger of development, and there is a 'fundamentally undermining' concern recognising that Iver is a historic village in proximity to London and given east-west connecting features including the Slough Arm of the Grand Union Canal and the Colne Valley Trail.<sup>28</sup> However, concerns are reduced on account of the M25 and constraints either side, namely the Colne Brook, the River Colne, the Grand Union Canal (including Cowley Lock Conservation Area) and [Huntsmore Park](#).
- Slough to Richings Park – on the one hand there are limited sensitivities given urbanising influences, the mainly 20<sup>th</sup> century origins of Richings Park (N.B. there are many locally listed buildings), areas of minerals extraction / landfill and the fact that the key green infrastructure asset – [Richings Park](#) – is not publicly accessible (it is a golf course). However, on the other hand, there is already limited sense of separation between London and Slough, and there is a risk creating one of the more significant linear projections / fingers of development in the London Green Belt.
- East of the M25 – the north of this sector, in the vicinity of New Denham, has already been discussed. To the south of the A4007 is then an area of former landfill where there are few 'fundamentally undermining' concerns given containment by the M25. Land to the east of Iver, either side of the B470, is then considered to be sensitive, for the reasons discussed above. To the south is then a major area of flood risk. Finally, land in the vicinity of Thorney is of some importance from a 'fundamentally undermining' perspective, but it is noted that much of land in this area is former landfill.

<sup>28</sup> It can also be noted that this is a rare instance of likely grade 1 agricultural land in Buckinghamshire.

## Conclusion

- 7.2.37. This section has considered sub-areas across the study area with a view to identifying risks in respect of development fundamentally undermining the Green Belt. This is important because the introduction of grey belt represents a major change of tack compared to the policy environment over the past 50 or more years, such that there is a need to carefully consider growth strategy.
- 7.2.38. However, this exercise is challenging without growth options / scenarios having been defined, and also due to uncertainty in respect of the scale at which a 'fundamentally undermining' concern becomes significant.
- 7.2.39. Attention has focused primarily on land outside of the National Landscape (NL), given that growth in the NL will typically be of a limited scale that generates limited 'fundamentally undermining' concerns. However, a number of sensitive settlement gaps within the NL are highlighted. As part of this, a strategic consideration is the series of Metropolitan Line corridor settlements.
- 7.2.40. Outside of the NL, there are clear strategic considerations around both: A) A40 / M40 / Chiltern Line corridor (also the Wye Valley); and B) the A4 / M4 / Elizabeth Line / Great Western Mainline / River Thames corridor. In both areas strategic growth options must be carefully considered aimed at avoiding fundamentally undermining this sector of the London Green Belt, and also with a view to realising growth opportunities including in terms of green / blue infrastructure given a collection of assets of at least sub-regional significance.

