



BUCKINGHAMSHIRE LOCAL PLAN REGULATION 19 CONSULTATION

REPRESENTATION

Further to the publication of the Regulation 19 Buckinghamshire Local Plan (LP4B) of 23 July 2026, Shabbington Parish Council submits these formal representations to Buckinghamshire Council (BC).

As required by §36 of the 2024 National Planning Policy Framework (NPPF), these representations are framed using three of the tests of soundness of the Plan: is it justified, effective and consistent with national policy?

In those regards, the Parish Council considers the plan unsound for the following reasons:

Unjustified

The proposed spatial strategy has not been properly justified against the reasonable alternatives. Some alternatives have been tested but many others have not, rendering the Sustainability Appraisal invalid as a meaningful, lawful exercise.

At the heart of the unsound plan is the approach taken to the spatial strategy for housing in Policy SP2 and the underpinning Settlement Review. The approach justifiably considers some communities are too small or have too few facilities to deliver sustainable development.

However, its use of a single, crude, 500 population threshold has created many anomalies, crucially assumes a static operating environment for local services, and ignores both the remoteness of the settlement and its functional dependency on its neighbouring settlements. For reference, the 2021 population of Shabbington was 528. As a result, the SP2 spatial strategy is based on an approach and data that are too simplistic and run a considerable risk of leading to development in unsustainable locations.

In practice, and what would reasonably be expected of the residents of a sustainable settlement, for a settlement to be capable of accommodating major housing development, it must contain at least three of the following primary features:

- a primary school (with room for expansion if serving a wider rural area and/or if the scale of housing growth planned warrants it);
- a village shop (for convenience goods purposes, either existing or where the scale of new housing development will finance the delivery of a new unit)



- a community facility (configured to enable a variety of indoor and outdoor recreation, leisure services and events to be provided throughout the day and evening through the full week, with car parking and with safe and convenient access by walking and cycling for a large majority of its residents)
- a quality bus service (i.e. unrestricted 7am – 7pm hourly services on weekdays and at least Saturday) connecting the settlement to at least one higher order (Tier) settlement that redresses any deficiency in the above features.

Any other feature, e.g. public house, church and sources of employment are secondary and should not be a determinant of sustainable location. Villages with this range of primary and some secondary features are far more resilient to change in the future, with the facilities reinforcing each other as a critical mass and being bolstered by a suitable scale of housing growth.

Those villages that do not, cannot sustain the loss of one or two features and the justification that allocating housing land will improve their 'vitality' has no basis in the evidence. Shabbington clearly does not meet these criteria – it has no school and its public transport service is woefully inadequate, the result of which is a village completely dependent on car use.

Instead, the approach taken to defining the hierarchy has led to countless Tier 3 – 5 settlements outside and inside the Green Belt (where as 'villages' most land on their edge will be deemed Grey Belt – see below) that have a higher services score than Shabbington, but have no allocation proposals.

Shabbington finds itself in tier 5 and in consequence is categorised as developable. However there are seven settlements with a services score at or above Shabbington: Swanbourne (6/7), Cholesbury-cum-St Leonards and Great & Little Hampden (5/7), and Cryers Hill, Dagnall, Dinton, Little Missenden and Westcott (4/7) with no housing allocations simply because they are marginally lower. There are at least 22 settlements with a trading pub; at least eight have an open primary school; five have verified pre-school provision; at least 15 have a village hall; and six have a shop. All of these settlements should have been assessed as reasonable alternative locations in the Sustainability Appraisal of Policy SMA001 and of the proposed hierarchy but no assessment has been undertaken.

The report states that Shabbington has 3 out of 7 key services: a pub, village hall and a recreation field and 1 out of 6 of the non-key services, a church. However, what it fails to acknowledge that the pub (which lies outside the village) is up for sale; the village hall is very small with no parking; the recreation field is flooded for most of the winter months and is unusable; and the church has no incumbent vicar. The nearest Tier 1 or 2 settlement is four miles away – Thame in Oxfordshire, not Aylesbury as quoted in the Plan.



The village is therefore already weak in terms of accessibility and in operating sustainably and is highly vulnerable to any further degradation. Furthermore, the scale of new housing proposed – 50 homes – is not on a scale that would enable a step-change in any of these features, and the village remains too remote from strategic transport infrastructure and higher order settlements to justify the scale that is proposed, let alone the scale that would be necessary.

The consequences of the proposals are stark and again highlight the weaknesses in the justification for Policy SP2 and the Policy SWA001 allocation proposals. They demonstrate no understanding of the functional geography of the village, nor of how our settlement relates to its neighbours at Ickford, Long Crendon and Thame.

Specifically, village school children attend the local comprehensive school in Thame Oxfordshire which is four miles away. With significant ongoing development and more planned for Thame, the school catchment area is being modified to exclude future Shabbington pupils and in consequence even longer journeys will be required for school children. We see no evidence that sensible cross boundary consultation has taken place with Oxfordshire about this major infrastructure challenge: indeed in the South Oxfordshire Plan there is reference to the problems of capacity at Lord William's School Thame and the problem of engaging Buckinghamshire Council about this cross boundary issue. They record that Buckinghamshire had commented "that they did not see a need to have a meeting...or to engage with us (South Oxfordshire) to prepare a Statement of Common Ground". As there are no other secondary schools in this part of the county this is a major concern for families in Shabbington and surrounding villages.

Of equal concern would be access to primary school places. Ickford Primary School is the nearest primary school to Shabbington. At present the school is full and has little opportunity to expand. Two recent large housing developments in Ickford have resulted in the redrawing of its catchment area so that no children from Shabbington now qualify for a place. The proposed allocation of 170 homes in Ickford will make this an even more remote possibility and will increase competition for scarce places in other nearby villages, including Long Crendon.

The next nearest Primary School is located there and is at effective capacity. Its feeder nursery is also full with a waiting list. Although the school site may have some limited capacity to expand, the proposed 315 homes in Long Crendon will absorb any spare additional capacity to accommodate Shabbington children.

The justification failings have been needlessly accentuated by three fundamental errors by BC:

- to neither plan for the release of Green Belt in the south of the county - including of land in the National Landscape for non-major development sites to achieve exactly the type of vitality boosting of villages it argues here, but



many of which have experienced population decline, declining access to affordable housing, and the loss of services as a result of being constrained by the Green Belt for decades – nor to make provision for any approved schemes in the Grey Belt in its windfall numbers, despite all the evidence to the contrary of approved schemes in the county since December 2024

- the acceleration of the LP4B assessment, site selection and policy making processes since February 2026, with no meaningful engagement with any parties, which has not allowed for the individual and cumulative effects of the proposals to be properly considered and for reasonable judgements to be made
- the resistance to see local communities as plan making partners that could have shared the responsibility for avoiding the superficial evidence analysis and simplistic spatial approach described above

In addition, many of the site assessments in the HELAA and in the allocation proposals in Appendix K contain errors, omissions and inconsistencies in the application of the assessment criteria. This is the result of an evidence base that is disproportionately weak in its breadth and depth to serve this purpose.

For example, Shabbington has serious and worsening fluvial and surface flooding. Two out of three main village roads are regularly closed during winter months by flooding events. During 2024, Mill Road was closed on 66 days and both Mill Road and Ickford roads were shut for 25 days. When these roads are closed, traffic is funnelled onto the one remaining open road – Crendon Road - causing congestion and hazardous driving conditions and seriously disrupting the single morning and evening school bus service.

In addition, three of the four proposed sites have serious access issues, with one (Stables, 3353) requiring a long (150m), new road to be constructed to join Ickford Road to support only 10 homes. This is impractical and increases the risk of further development on the land made to justify the high cost of creating access.

A thorough examination of the evidence base, including the comments made by the Parish Council in response to the rushed February 2026 consultation, would have revealed all these facts and practical issues.

The Parish Council is mindful, however, that even small villages may benefit from a degree of new housing development and for Shabbington the Standard Method calculation of local housing need for the village (3.7 homes/annum, indicates a potential for approx. 55 over this plan period). However this methodology is a starting point for assessing potential development capacity and when other factors are taken into account it is clear that sustainable development in this village is not feasible. Some settlements, like Shabbington, fall far short of being able to meet that the Standard Measure figure simply because of their remote geography and legacy infrastructure, weaknesses for which there are no mitigation measures. The finishing



point must therefore be lower. As noted above, however, other smaller settlements are located on strategic public transport routes, with stronger legacy infrastructure which may justify higher levels of development.

The LP4B displays none of this spatial planning understanding and as a result is unjustified versus the (untested) reasonable alternatives.

Buckinghamshire Council has not been explicit in how, if at all, it has used the Method to draw a line in the number of housing sites it proposes to allocate, but the Parish Council notes that the two coincide here and in many other parishes. We also know that when pressed, BC advised parish councils to use the Method as their starting point for defining an ‘indicative housing target’ in their neighbourhood plans.

Ineffective

The Housing Strategy (per the Topic Paper) and Settlement Review are deeply flawed in their rationale and consistency of application across the Tier 4 and Tier 5 villages. Even if there had been a sound basis for allocating land for housing development in Shabbington, which there is not, the site allocation policies in Appendix K are ineffective in attempting to establish the essential land use, design, development and infrastructure requirements for each site.

For example, to identify only the potential for harmful odour effects arising from the nearby sewerage works leaves many other, more important flooding, traffic, landscape and infrastructure efforts to planning applications to resolve. With the new National Development Management Policies superseding the LP4B, unless there are main modifications resolving that, then a vital opportunity has been missed to ensure the effective implementation of these, and most other, allocations in Policy SMA001 and Appendix K.

The unjustified spatial strategy and site allocations will also be ineffective, with unreasonable and unfounded expectations of delivery during the plan period.

The strategy is fundamentally dependent on a very small number of very major development proposals in the northern half of the county only being successfully delivered late in the plan period.

The assumptions made about the timely availability of land, infrastructure and public and private sources of funding, let alone the ability of your Council to consistently and effectively manage development and events over a twenty year period, are wholly unreasonable.

This choice of strategy was not inevitable nor the most effective of the reasonable alternatives. However, the final Sustainability Appraisal fails to be objective in the assessment of those alternatives. Its view that there is a ‘clear case’ for directing a



significant proportion of growth to strategic-scale sites is not evidenced, nor the well-known weaknesses of such a strategy acknowledged. The fact that many Local Plans adopting this approach either fail, or their housing land supply positions fall soon after plan adoption, is not acknowledged either.

The risks of an evidence base and resulting strategy being pulled together at an accelerated pace, rather than being properly considered and engaged on with key stakeholders, are very significant. The impact of failure will be substantial and their likelihood of it happening is also very high.

Again, the Appraisal ignores what would have been a very obvious reasonable alternative: a spatial strategy based on a different blended mix of the strategic options across the whole county, including the Metropolitan Green Belt and the Chilterns National Landscape with a much greater emphasis on smaller (< 200 home) sites and dispersed across genuinely sustainable locations. This is a fundamental failure and one that cannot be explained.

Consistency with National Policy

The plan is inconsistent with some key spatial planning and other policies in the NPPF:

- §16 – failing to bring forward the plan in a way that allowed for early, proportionate and effective engagement with communities, local organisations, businesses or infrastructure providers and in contravention of the legal requirements and guidance for carrying out the Regulation 18 consultation – the scale and importance of this failing cannot be overstated, especially in the acceleration of the process in recent months
- §72 – as made clear in its proposed housing supply trajectory, failing to identify a sufficient supply of deliverable and developable housing sites over the plan period and failing to operate a meaningful, accurate site assessment process
- §73 – failing to identify a sufficient supply of small and medium sized housing sites (approx. 5% versus the target 10%), a failure exacerbated by the failure to encourage and enable neighbourhood plans to serve this precise purpose
- §75 – failing to make provision for the inevitable, and likely very significant ‘windfall’ housing supply from approved schemes on land deemed as Green Belt, and with no explanation
- §77 – failing to work with the support of our community in any meaningful way in planning the proposed housing allocations in the village; or to understand our constraints
- §83 – failing to make proposals in our rural area that will enhance or maintain the vitality of our community with no justification or explanation for how a



larger, inevitably car-dependent population could thrive, rather than exacerbate existing problems

- §109 – failing to understand or address the potential individual or cumulative impacts of development on the local transport network, or to assess or consider the impacts of proximate site allocations along the A418 corridor – notably in Ickford, Long Crendon and Haddenham in the county but also Thame and Chinnor
- §110 – failing to justify or explain how the proposals at Shabbington is a location that is, or can be made, sustainable through limiting the need to travel and offering a genuine and timely choice of transport modes
- §115 – failing to take account of the impracticality of ensuring safe and sustainable access to new homes or an of their cumulative impact on the road network – in addition to the effects of flooding events, the village is the main access road to industrial sites in nearby Worminghall and the pavements are narrow and butt up to the highway, with no pavement to parts of the village effectively isolating sections of the village from the bus stops.
- §129 – failing to take into account the desirability of maintaining an area's prevailing character and setting, as a 24% increase in the village population would dramatically change the character of this rural community but deliver no uplift in community infrastructure, a fact common in the consistent refusal of planning applications to date
- §132 – failing to set out any meaningful design vision in the plan, which is instead focused entirely on planning for housing growth, or to formulate design policies with local communities
- §145-§147 – failing to build a coherent, evidenced case for the exceptional circumstances to alter Green Belt boundaries, when the spatial, economic and delivery consequences of that strategy compared to the reasonable alternatives are so stark and substantial
- §189 – failing to acknowledge that the objective of 'conserving and enhancing landscape and scenic beauty in National Landscapes' can allow for minor, medium and some major development of an appropriate scale and extent to be allocated as a distinct exercise to that of judging the exceptional circumstances for altering Green Belt boundaries and to support sustainable communities

These failings are fundamental and are one of the main reasons why the proposed spatial strategy is unsound.

Summary

As a result of these policies that are unjustified, ineffective and/or inconsistent with national policy, the Parish Council considers the proposed submission version of the LP4B to be wholly unsound. Furthermore, given the scale of its policy and process failings it appears very unlikely that changes are possible to make the plan sound.



Shabbington
Parish Council

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The Parish Council takes no satisfaction in reaching this conclusion. BC's lengthy delay in bringing forward the Plan and the failure to maintain an adequate supply of housing land is leading to unplanned and uncoordinated, speculative housing proposals that could harm the town/village.

The Parish Council gives notice that it will submit a statement to, and wish to participate in, the examination of the Local Plan, per section 20(6) of the Planning & Compulsory Purchase Act 2004.

Given BC chose not to have a lawful, meaningful Regulation 18 consultation on a draft plan and its evidence and assessments, and with there now being only a six week period to comment (that coincides with the holiday period), there has been insufficient opportunity for us to provide a full response now. We will therefore use the period between now and the examination hearings to prepare and present our full response.

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Chairman

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